JEREMY RYAN
4075 Park Blvd #102-165
San Diego, CA 92103
858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN Plaintiff(s), vs. GOOGLE LLC Defendant(s)	Case No.: **26CV488743** **DECLARATION OF JEREMY RYAN IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SPECIAL INTERROGATORIES, AND REQUESTS FOR ADMISSION, SET ONE** **Date: 01/14/2027** Time: 09:00 AM Reservation Number: ZYVCG4RF **Dept.: 6** **Judicial Officer: Hon. Rafael Sivilla-Jones**

DECLARATION OF JEREMY RYAN

I, Jeremy Ryan, declare as follows:

1. I am the Plaintiff in the above-captioned action, appearing in pro per. I have personal knowledge of the facts set forth in this declaration, except as to those matters stated on information

and belief, and as to those matters I believe them to be true. If called as a witness, I could and would testify competently to the matters stated herein. I make this declaration in support of Plaintiff's Motion to Compel Further Responses to Requests for Production of Documents, Special Interrogatories, and Requests for Admission, Set One (the "Motion").

2. On June 10, 2026, I served Defendant Google LLC ("Google"), by electronic service on its counsel of record, Plaintiff's Requests for Production of Documents, Set One (Nos. 1–28), Special Interrogatories, Set One (Nos. 1–17), and Requests for Admission, Set One (Nos. 1–26). A true and correct copy of that discovery packet is attached hereto as Exhibit 1.

3. On June 20, 2026, I sent a written preservation notice by email to Google's litigation counsel, Matthew Reed and Jenna Stokes of Wilson Sonsini Goodrich & Rosati, advising Google that I had created a Google Workspace account using jeremy@segwayjeremy.com, and that Google's own domain-verification infrastructure had confirmed my ownership and control of the domain segwayjeremy.com and the email address jeremy@segwayjeremy.com, the same address that serves as the recovery email for haterfactory2@gmail.com. Google's counsel did not respond disputing any factual assertion in that notice. A true and correct copy of that email is attached hereto as Exhibit 2.

4. On June 22, 2026, I sent a supplemental notice to the same counsel advising that I had disabled domain privacy on the segwayjeremy.com WHOIS registration, making the full registrant record publicly viewable, and that the public record reflected registrant contact information, including the telephone number (608) 630-4975, the same Google Voice number at issue in this litigation. A true and correct copy of that email, together with the corresponding GoDaddy WHOIS printout confirming registration of segwayjeremy.com to "Jeremy Ryan" as of August 1, 2023, is attached hereto as Exhibit 3.

5. On July 6, 2026, Google's General Counsel, Halimah DeLaine Prado, received by USPS certified mail (tracking no. 9207 1901 4298 0485 3969 97) a letter from me describing, independently of outside counsel, the same DNS-verification and WHOIS facts referenced above. USPS tracking records confirm the letter was delivered and signed for in Mountain View, California at 11:04 a.m. on July 6, 2026. A true and correct copy of that letter and the corresponding USPS tracking history is attached hereto as Exhibit 4.

6. On July 8, 2026, Google's General Counsel received a second letter by FedEx (tracking no. 8739 9565 2175), enclosing the complete June 10, 2026 discovery packet described in paragraph 2 above. A true and correct copy of that FedEx shipment label, tracking confirmation, and enclosed letter is attached hereto as Exhibit 5.

7. On July 14, 2026, Google served, through counsel, three sets of verified Objections and Responses: (a) Objections and Responses to Requests for Production of Documents, Set One; (b) Objections and Responses to Special Interrogatories, Set One; and (c) Objections and Responses to Requests for Admission, Set One, each verified by Tal Almogy under penalty of perjury. True and correct copies of those three sets of verified responses are attached hereto as Exhibits 6, 7, and 8, respectively.

8. On July 14, 2026, I sent Google's counsel of record a detailed written meet-and-confer letter identifying the discovery deficiencies described in the Motion and requesting that Google withdraw its objections and supplement its responses by 5:00 p.m. on July 18, 2026. Google did not substantively respond to that letter, did not withdraw any objection, and did not supplement any response by that date or as of the filing of the Motion. A true and correct copy of that letter is attached hereto as Exhibit 9.

9. Exhibit 10 is a true and correct copy of the complete history of Better Business Bureau Complaint No. 24589850, which I filed against Google on March 2, 2026, including Google's

written responses to that complaint from its Tier 3 support personnel and the BBB's transmittal advising Google that its response represented "a truthful account of your experience with this consumer." I obtained this record directly from the Better Business Bureau's complaint portal.

10. Exhibit 11 is a true and correct copy of (a) a Wayback Machine capture, dated April 23, 2026, of Google's published web page at myaccount.google.com/intro/recovery/email, and (b) a live screenshot of the same page that I captured on July 16, 2026. Both captures display the identical text: “Set a recovery email address and phone number so we can reach you in case we detect unusual activity in your Google Account or you accidentally get locked out.”

11. The exhibits described above are true and correct copies of the documents, communications, and records they purport to be, maintained in the ordinary course of my correspondence and litigation files in this matter, and have not been altered in any material respect.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 17, 2026, at San Diego, California.

/s/ Jeremy Ryan

Jeremy Ryan, Declarant

Exhibit 1

JEREMY RYAN
4075 Park Blvd #102-165
San Diego, CA 92103
858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN,
Plaintiff,
v.
GOOGLE LLC,
Defendant.

Case No.: 26CV488743

PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE

Dept.: 6
Judicial Officer: Hon. Rafael Sivilla-Jones

PROPOUNDING PARTY: Plaintiff Jeremy Ryan
RESPONDING PARTY: Defendant Google LLC
SET NUMBER: One

Pursuant to California Code of Civil Procedure sections 2031.010 et seq., Plaintiff Jeremy Ryan requests that Defendant Google LLC produce for inspection and copying the documents and things described below within 30 days of service of this request.

DEFINITIONS

1. "GOOGLE" means Defendant Google LLC, its officers, directors, employees, agents, representatives, predecessors, successors, subsidiaries, and all persons acting on its behalf.

2. "ACCOUNT(S)" means the Google accounts haterfactory2@gmail.com and haterfactory@gmail.com, individually and collectively.

3. "PLAINTIFF" means Jeremy Ryan.

4. "LOCKOUT DATE" means January 22, 2026.

5. "RECOVERY EMAIL" means any email address designated as a recovery or backup email address for either Account, including but not limited to jeremy@segwayjeremy.com and jryan_winston@yahoo.com.

6. "DOCUMENT" has the broadest meaning permitted under California law and includes all writings, recordings, emails, text messages, logs, system records, internal communications, policies, training materials, database entries, metadata, and electronically stored information.

7. "PURCHASE" means any charge, subscription, renewal, purchase, in-app purchase, or recurring billing transaction associated with either Account, whether billed through PayPal, a credit card, debit card, Google Play, Google One, direct billing, carrier billing, or any other payment method or platform.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All account logs, system records, and audit entries for haterfactory2@gmail.com from account creation through the date of this request, including login history, device history, IP address history, and any automated system actions taken on the account.

REQUEST FOR PRODUCTION NO. 2:

All account logs, system records, and audit entries for haterfactory@gmail.com from account creation through the date of this request, including login history, device history, IP address history, and any automated system actions taken on the account.

REQUEST FOR PRODUCTION NO. 3:

All logs, records, and system entries reflecting any addition, removal, or modification of recovery phone numbers or recovery email addresses for haterfactory2@gmail.com from account creation through the date of this request, including the date, time, method, and IP address associated with each change.

REQUEST FOR PRODUCTION NO. 4:

All logs, records, and system entries reflecting any addition, removal, or modification of recovery phone numbers or recovery email addresses for haterfactory@gmail.com from account creation through the date of this request, including the date, time, method, and IP address associated with each change.

REQUEST FOR PRODUCTION NO. 5:

All records related to the number porting request for telephone number 608-630-4975 into Google Voice, including the original porting request, carrier verification records, number transfer authorization documents, LOA (Letter of Authorization), and any records identifying the requesting party or account holder.

REQUEST FOR PRODUCTION NO. 6:

All records showing what recovery methods — including recovery email addresses and recovery phone numbers — were configured on haterfactory2@gmail.com as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 7:

All records showing what recovery methods — including recovery email addresses and recovery phone numbers — were configured on haterfactory@gmail.com as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 8:
The complete outbound email logs and system records showing the Critical Security Alert sent on April 18, 2026 at approximately 5:54 PM to jeremy@segwayjeremy.com, including the system or process that generated the alert, the content of the alert, and all metadata associated with that transmission.

REQUEST FOR PRODUCTION NO. 9:
All records, logs, and internal communications showing when and why Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com ceased after service of this lawsuit on Google LLC.

REQUEST FOR PRODUCTION NO. 10:
All internal communications — including emails, Slack messages, tickets, or any other messaging format — regarding Plaintiff's accounts, Plaintiff's lockout, or Plaintiff's account recovery attempts from January 22, 2026 through the date of this request.

REQUEST FOR PRODUCTION NO. 11:
All records related to BBB Complaint No. 24589850, including internal escalation records, communications between Google employees about the complaint, the complete case file, and all communications sent to or received from the Better Business Bureau in connection with that complaint.

REQUEST FOR PRODUCTION NO. 12:
All billing records showing every charge made to any payment method associated with haterfactory2@gmail.com — including Plaintiff's PayPal account and any credit or debit card on file — from January 22, 2026 through the date of this request.

REQUEST FOR PRODUCTION NO. 13:
All billing records showing every charge made to any payment method associated with haterfactory@gmail.com from account creation through the date of this request.

REQUEST FOR PRODUCTION NO. 14:
All records showing any attempt by Google to cancel, pause, or flag for cancellation any subscription associated with haterfactory2@gmail.com after January 22, 2026.

REQUEST FOR PRODUCTION NO. 15:
All records showing any chargeback, dispute, or payment reversal filed in connection with any subscription charge on haterfactory2@gmail.com after January 22, 2026, and Google's response to each such dispute.

REQUEST FOR PRODUCTION NO. 16:

Google's internal policies, procedures, training materials, and guidelines governing account recovery for users who have a recovery email address on file and are locked out of their account, in effect as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 17:
Google's internal policies, procedures, training materials, and guidelines governing when Google's automated account recovery system uses recovery email as a verification method versus when it does not, in effect as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 18:
All versions of Google's published consumer-facing documentation regarding recovery email, including pages at support.google.com/accounts/answer/7682439, support.google.com/accounts/answer/183723, and myaccount.google.com/intro/recovery/email, as they existed on January 22, 2026.

REQUEST FOR PRODUCTION NO. 19:
All documents sufficient to identify every Google employee who reviewed, accessed, or made any decision about Plaintiff's accounts after January 22, 2026.

REQUEST FOR PRODUCTION NO. 20:
All support tickets, case records, and internal escalation records opened in connection with Plaintiff's account recovery requests, including the complete support case referenced as Case ID 5-0866000040996.

REQUEST FOR PRODUCTION NO. 21:
All communications between any Google employee and any third party — including Wilson Sonsini Goodrich & Rosati — regarding Plaintiff's accounts, Plaintiff's claims, or the litigation in Case No. 26CV488743 from January 22, 2026 through the date of this request.

REQUEST FOR PRODUCTION NO. 22:
All versions of Google's Terms of Service, Google One Terms of Service, and Google Play Terms of Service applicable to Plaintiff's accounts as of January 22, 2026, including all terms governing account recovery, account access, subscription cancellation, and billing during account lockout.

REQUEST FOR PRODUCTION NO. 23:
All records sufficient to show the total amount charged to Plaintiff's PayPal account and any credit or debit card on file for subscriptions associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request, including subscription name, charge amount, and charge date.

REQUEST FOR PRODUCTION NO. 24:

All records showing any action taken by Google to modify, restrict, or alter any setting on haterfactory2@gmail.com or haterfactory@gmail.com after service of this lawsuit, including any modification to recovery email settings or security alert delivery settings.

REQUEST FOR PRODUCTION NO. 25:
All documents reflecting Google's litigation hold or preservation notice issued in connection with Case No. 26CV488743, including the date issued, the recipients, and the categories of documents subject to the hold.

REQUEST FOR PRODUCTION NO. 26:
All records showing the name, billing address, payment account, and billing contact information for every purchase, subscription, renewal, or recurring charge associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request, regardless of payment method.

REQUEST FOR PRODUCTION NO. 27:
All records showing the name, billing address, payment account, and billing contact information for every purchase, subscription, renewal, or recurring charge associated with haterfactory@gmail.com from account creation through the date of this request, regardless of payment method.

REQUEST FOR PRODUCTION NO. 28:
All records identifying any billing address, name, or contact information Google associates with any payment method used for purchases, subscriptions, or recurring charges on either Account.

JEREMY RYAN
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858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN, Case No.: 26CV488743
Plaintiff,
v. DISCOVERY REQUESTS
SET ONE
GOOGLE LLC,
Defendant.
Dept.: 6
Judicial Officer: Hon. Rafael Sivilla-JonesPROPOUNDING PARTY:
Plaintiff Jeremy Ryan
RESPONDING PARTY: Defendant Google LLC
SET NUMBER: One

Pursuant to California Code of Civil Procedure sections 2030.010 et seq., Plaintiff Jeremy Ryan propounds the following Special Interrogatories to Defendant Google LLC. Defendant is required to respond in writing under oath within 30 days of service.

DEFINITIONS

The definitions set forth in Plaintiff's Requests for Production, Set One, are incorporated herein by reference.

SPECIAL INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

IDENTIFY every person at Google who reviewed, accessed, or made any decision regarding Plaintiff's account haterfactory2@gmail.com after January 22, 2026, including their name, title, and department.

SPECIAL INTERROGATORY NO. 2:

IDENTIFY every person at Google who reviewed, accessed, or made any decision regarding Plaintiff's account haterfactory@gmail.com after January 22, 2026, including their name, title, and department.

SPECIAL INTERROGATORY NO. 3:
State in complete detail the factual and technical basis for Google's contention, stated in its April 6, 2026 BBB response, that it was "unable to authenticate" Plaintiff's account, including what authentication methods were presented to Plaintiff and why each was deemed insufficient.

SPECIAL INTERROGATORY NO. 4:
Identify the technical system, process, or software that generated and transmitted the Critical Security Alert sent on April 18, 2026 to jeremy@segwayjeremy.com identifying it as "the recovery email for this account," and state why that same system cannot be used to send an account recovery verification code to the same address.

SPECIAL INTERROGATORY NO. 5:
State whether Google contends that recovery email is optional — meaning Google's automated system has discretion to decline to use it as a verification pathway even when the user has properly configured it — and if so, identify every document, policy, or term that discloses that limitation to consumers.

SPECIAL INTERROGATORY NO. 6:
State the exact date, reason, and technical or policy basis for the cessation of Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com after this lawsuit was served on Google LLC.

SPECIAL INTERROGATORY NO. 7:
State every step Google took to investigate Plaintiff's claims prior to issuing its April 6, 2026 BBB response, including every internal review, escalation, or technical inquiry conducted.

SPECIAL INTERROGATORY NO. 8:
Identify every subscription or recurring charge associated with haterfactory2@gmail.com that was active on January 22, 2026, and state whether each subscription continued to be charged after that date, and if so, through what date.

SPECIAL INTERROGATORY NO. 9:
State the complete factual basis for Google's affirmative defense of statute of limitations as it relates to Plaintiff's claims regarding haterfactory@gmail.com, including the date Google contends Plaintiff's cause or causes of action accrued.

SPECIAL INTERROGATORY NO. 10:
State the complete factual basis for Google's affirmative defense of unclean hands, including every specific act or omission by Plaintiff that Google contends constitutes the basis for that defense and how each act relates directly to the subject matter of this litigation.

SPECIAL INTERROGATORY NO. 11:

State the complete factual basis for Google's affirmative defense of failure to mitigate, including every specific step Google contends Plaintiff could have taken to mitigate damages and why each step was available and reasonably accessible to Plaintiff after January 22, 2026.

SPECIAL INTERROGATORY NO. 12:
Identify every account recovery option that Google contends was available to Plaintiff for haterfactory2@gmail.com after January 22, 2026, and state why each option was accessible to Plaintiff given that Plaintiff's digital devices had been seized.

SPECIAL INTERROGATORY NO. 13:
State the date and method by which telephone number 608-630-4975 was ported into Google Voice, and identify the account holder listed in the porting request for that number.

SPECIAL INTERROGATORY NO. 14:
State whether any Google employee or agent communicated with any federal law enforcement agency regarding Plaintiff's accounts, and if so, identify the agency, the date, and the subject of those communications.

SPECIAL INTERROGATORY NO. 15:
Identify all persons who Google expects to call as witnesses at trial in this matter, and for each person, state the subject matter of their expected testimony.

SPECIAL INTERROGATORY NO. 16:
State the name, billing address, and payment source associated with each purchase, subscription, renewal, or recurring charge Google contends is associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request.

SPECIAL INTERROGATORY NO. 17:
State the name, billing address, and payment source associated with each purchase, subscription, renewal, or recurring charge Google contends is associated with haterfactory@gmail.com from account creation through the date of this request.

JEREMY RYAN
4075 Park Blvd #102-165
San Diego, CA 92103
858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN, Case No.: 26CV488743
Plaintiff,
v. DISCOVERY REQUESTS
SET ONE
GOOGLE LLC,
Defendant.
Dept.: 6
Judicial Officer: Hon. Rafael Sivilla-JonesPROPOUNDING PARTY: Plaintiff Jeremy Ryan
RESPONDING PARTY: Defendant Google LLC
SET NUMBER: One

Pursuant to California Code of Civil Procedure sections 2033.010 et seq., Plaintiff Jeremy Ryan requests that Defendant Google LLC admit or deny the following within 30 days of service.

NOTE: If Google fails to admit any matter that is later proven true, Plaintiff may seek the costs of proof of that matter pursuant to CCP § 2033.420.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:
Admit that as of January 22, 2026, jeremy@segwayjeremy.com was configured as the recovery email address on file for haterfactory2@gmail.com.

REQUEST FOR ADMISSION NO. 2:
Admit that as of January 22, 2026, jryan_winston@yahoo.com was configured as the recovery email address on file for haterfactory@gmail.com.

REQUEST FOR ADMISSION NO. 3:
Admit that on April 18, 2026, Google's automated infrastructure sent an email to jeremy@segwayjeremy.com from no-reply@accounts.google.com.

REQUEST FOR ADMISSION NO. 4:

Admit that the April 18, 2026 email to jeremy@segwayjeremy.com stated that "jeremy@segwayjeremy.com is the recovery email for this account."

REQUEST FOR ADMISSION NO. 5:
Admit that the April 18, 2026 email to jeremy@segwayjeremy.com was sent twelve days after Google's Tier 3 agent told the BBB that Google was unable to authenticate Plaintiff's account.

REQUEST FOR ADMISSION NO. 6:
Admit that Google continued to charge Plaintiff's PayPal account for subscriptions associated with haterfactory2@gmail.com after January 22, 2026.

REQUEST FOR ADMISSION NO. 7:
Admit that Plaintiff had no ability to cancel subscriptions associated with haterfactory2@gmail.com while locked out of that account.

REQUEST FOR ADMISSION NO. 8:
Admit that Google's published documentation at support.google.com/accounts/answer/7682439 states that a user can recover their account using "a phone number or the recovery email address for the account."

REQUEST FOR ADMISSION NO. 9:
Admit that Google's published documentation at myaccount.google.com/intro/recovery/email states that a recovery email address is set up "in case you accidentally get locked out."

REQUEST FOR ADMISSION NO. 10:
Admit that Google received BBB Complaint No. 24589850 filed by Plaintiff.

REQUEST FOR ADMISSION NO. 11:
Admit that Google issued a formal written response to BBB Complaint No. 24589850 on or about April 6, 2026.

REQUEST FOR ADMISSION NO. 12:
Admit that Google's April 6, 2026 BBB response stated that Google was "unable to authenticate" Plaintiff's account.

REQUEST FOR ADMISSION NO. 13:
Admit that no court order required Google to lock Plaintiff out of haterfactory2@gmail.com or haterfactory@gmail.com.

REQUEST FOR ADMISSION NO. 14:
Admit that Google is not a named victim in United States v. Ryan, No. 8:26-cr-00041-TRB-CPT (M.D. Fla.).

REQUEST FOR ADMISSION NO. 15:

Admit that Google was not ordered by any federal or state court to deny Plaintiff access to his Google accounts.

REQUEST FOR ADMISSION NO. 16:
Admit that telephone number 608-630-4975 was ported into Google Voice by Plaintiff prior to January 22, 2026.

REQUEST FOR ADMISSION NO. 17:
Admit that telephone number 608-630-4975 currently forwards calls to a phone number accessible to Plaintiff.

REQUEST FOR ADMISSION NO. 18:
Admit that Google's automated account recovery system sent security alerts to jeremy@segwayjeremy.com on multiple occasions prior to this lawsuit being served on Google.

REQUEST FOR ADMISSION NO. 19:
Admit that Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com ceased after this lawsuit was served on Google LLC.

REQUEST FOR ADMISSION NO. 20:
Admit that Google's account recovery system has the technical capability to send a verification code to a recovery email address on file for a Google account.

REQUEST FOR ADMISSION NO. 21:
Admit that the Google One AI Ultra subscription associated with haterfactory2@gmail.com was active and being billed as of the date of this request.

REQUEST FOR ADMISSION NO. 22:
Admit that Plaintiff filed a support request with Google regarding access to haterfactory2@gmail.com prior to filing BBB Complaint No. 24589850.

REQUEST FOR ADMISSION NO. 23:
Admit that Google's published Terms of Service do not expressly disclose to consumers that Google's automated recovery system may decline to use a configured recovery email address as a verification pathway.

REQUEST FOR ADMISSION NO. 24:
Admit that Google's preservation obligation in this litigation attached no later than the date this lawsuit was served on Google LLC.

REQUEST FOR ADMISSION NO. 25:
Admit that Google has records reflecting the billing name and billing address associated with purchases, subscriptions, or recurring charges tied to haterfactory2@gmail.com.

REQUEST FOR ADMISSION NO. 26:
Admit that Google has records reflecting the billing name and billing address associated with purchases, subscriptions, or recurring charges tied to haterfactory@gmail.com.

PROOF OF SERVICE

I, Jeremy Ryan, declare:

I am the Plaintiff in the above-entitled action and am over the age of 18 years.
On June 10, 2026, I served the following document(s):

[X] Plaintiff's Requests for Production of Documents, Set One
[X] Plaintiff's Special Interrogatories to Defendant Google LLC, Set One
[X] Plaintiff's Requests for Admission to Defendant Google LLC, Set One

on Defendant Google LLC by causing a true and correct copy to be served by electronic mail on counsel of record:

Matthew Reed
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304
mreed@wsgr.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 10, 2026 at San Diego, California.

/s/ Jeremy Ryan
Jeremy Ryan, Plaintiff In Pro Per

Exhibit 2

Ryan v. Google LLC, Case No. 26CV488743 — Evidence Preservation Notice — Google Workspace Account

NFT Demon <jeremy@nftdemon.com> Sat, Jun 20, 2026 9:03 PM

To: "mreed@wsgr.com" <mreed@wsgr.com>, "jenna.stokes@wsgr.com" <jenna.stokes@wsgr.com>

Mr. Reed and Ms. Stokes,

I am writing to provide notice of a development relevant to the above-referenced matter and to request that Google take no adverse action against certain account records.

On June 20, 2026, I created a Google Workspace account using jeremy@segwayjeremy.com as the primary address. As you are aware, Google Workspace requires domain ownership verification through DNS record publication before an account becomes functional. That verification process has been completed. Google's verification system has accordingly confirmed my ownership and control of the domain segwayjeremy.com and the email address jeremy@segwayjeremy.com — the same address that serves as the recovery email for haterfactory2@gmail.com and that is referenced throughout the discovery requests served on June 10, 2026.

The DNS verification records, Workspace account creation records, and associated server logs constitute evidence relevant to this litigation. My existing preservation demands, served as part of the discovery packet on June 10, 2026, already encompass this category of records. I am writing separately to ensure Google is specifically on notice that the Workspace account itself, and all records associated with its creation and domain verification, are subject to those preservation obligations.

I request that Google take no action to alter, suspend, terminate, or otherwise interfere with the Google Workspace account associated with jeremy@segwayjeremy.com or the DNS verification records associated with segwayjeremy.com pending resolution of this matter.

Please confirm receipt of this notice.

Respectfully,

Jeremy Ryan/NFT Demon
Founder and CEO
NFT Demon Holdings LLC
858-327-1144
linktr.ee/nftdemon

Exhibit 3

Ryan v. Google LLC, Case No. 26CV488743 — Supplemental Notice Re: Domain Registration Records

NFT Demon <jeremy@nftdemon.com> Mon, Jun 22, 2026 8:21 PM

To: "jenna.stokes@wsgr.com" <jenna.stokes@wsgr.com>, "mreed@wsgr.com" <mreed@wsgr.com>

Mr. Reed and Ms. Stokes,

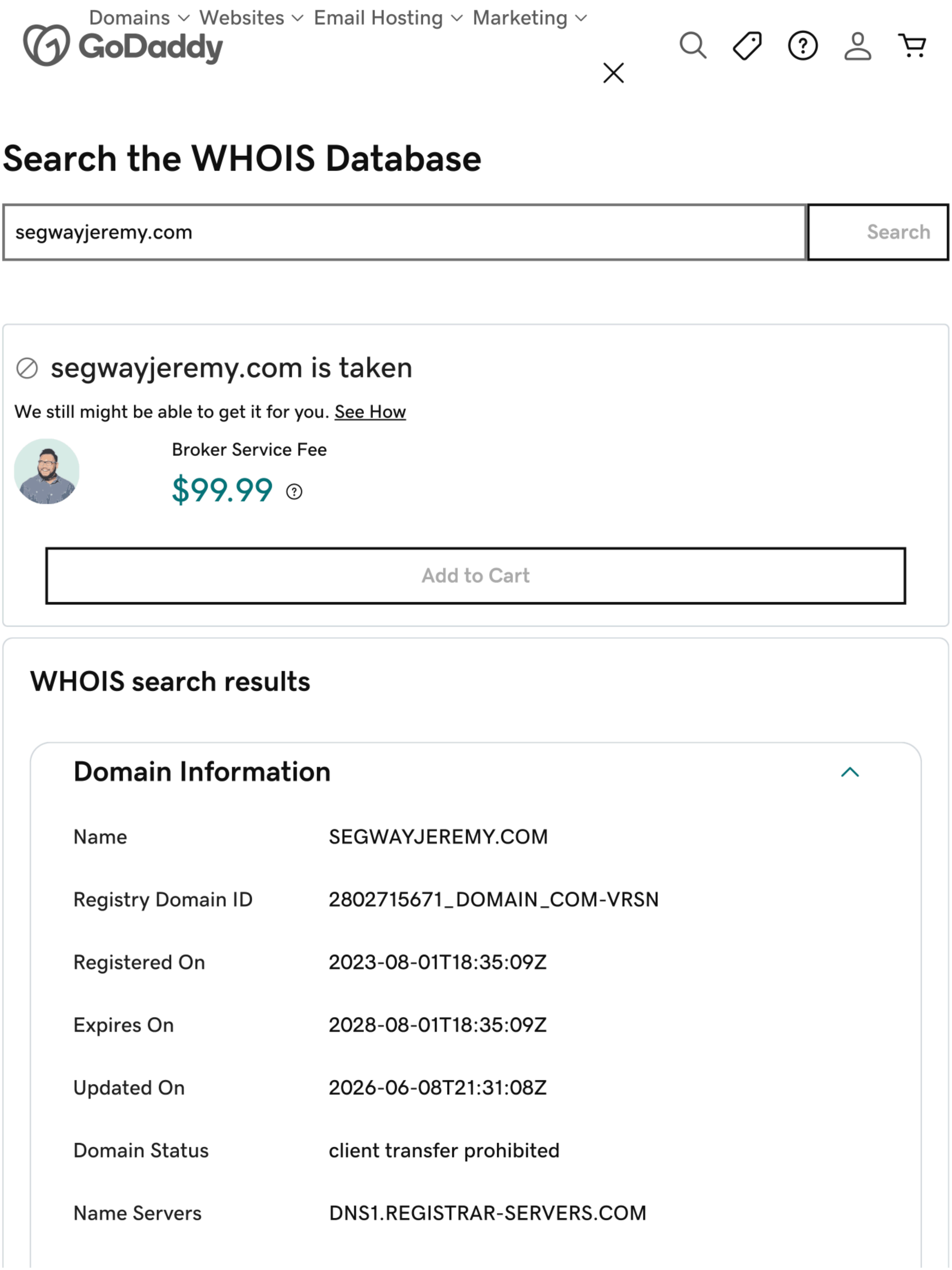
As a brief supplement to my preservation notice of June 20, 2026, I wanted to note that I have disabled domain privacy on the segwayjeremy.com registration, making the full WHOIS record publicly accessible.

The public record now reflects the registrant contact details on file with Namecheap at the time of registration, including the billing address and phone number associated with the account. I note that the phone number listed in the WHOIS record — (608) 630-4975 — is a Google Voice number associated with haterfactory2@gmail.com and was ported over prior to the registration. A review of my historical billing records will show the Portland address was used for a little over a year in between Wisconsin (where the number was ported) and California where I live now.

The full WHOIS record for segwayjeremy.com is publicly verifiable at any Whois site of your choosing.

Respectfully,

Jeremy Ryan/NFT Demon
Founder and CEO
NFT Demon Holdings LLC
858-327-1144
linktr.ee/nftdemon


GoDaddy
Domains
Websites
Email Hosting
Marketing
Search
Add to Cart

Search the WHOIS Database

segwayjeremy.com

segwayjeremy.com is taken

We still might be able to get it for you. See How

Broker Service Fee

$99.99

WHOIS search results

Domain Information

Name	SEGWAYJEREMY.COM
Registry Domain ID	2802715671_DOMAIN_COM-VRSN
Registered On	2023-08-01T18:35:09Z
Expires On	2028-08-01T18:35:09Z
Updated On	2026-06-08T21:31:08Z
Domain Status	client transfer prohibited
Name Servers	DNS1.REGISTRAR-SERVERS.COM

DNS2.REGISTRAR-SERVERS.COM

Registrant Contact

Name	Jeremy Ryan
Organization	–
Phone	tel:+1.6086304975
Fax	–
Email	jeremy@segwayjeremy.com
Mailing Address	6363 Southwest Canyon Court, 94113, Portland, OR, 97221

Technical Contact

Name	Jeremy Ryan
Organization	–
Phone	tel:+1.6086304975
Fax	–
Email	jeremy@segwayjeremy.com
Mailing Address	6363 Southwest Canyon Court, 94113, Portland, OR, 97221

Registrar Information

Exhibit 4

14315967.1.1-5

Jeremy Ryan
4075 Park Blvd
102-165
San Diego CA 92103

USPS CERTIFIED MAIL

9207 1901 4298 0485 3969 97

00143159670000011
Google Legal
ATTN: Halimah DeLaine Prado
1600 Amphitheatre Parkway
Mountain View CA 94043
USA

Ms. DeLaine Prado,

I am writing to you directly as a professional courtesy, not as a litigation tactic. I am the pro se plaintiff in the above-referenced case. I am writing because I have reason to believe the full picture of this case's risk profile has not been communicated to you by outside counsel, and I think you are entitled to that picture independently. You can verify everything I describe below from public records and Google's own internal systems in a matter of minutes.

What This Case Is About

On January 22, 2026, I was locked out of two Google accounts, haterfactory2gmail.com and haterfactorygmail.com, following a federal device seizure. Both accounts had properly configured recovery email addresses. Google's own published documentation at support.google.com/accounts/answer/7682439 and myaccount.google.com/intro/recoveryemail represents that recovery email exists specifically so that users who are "accidentally locked out" can recover access.

I followed Google's instructions precisely. I configured the recovery emails. I am locked out of the exact scenario those instructions address. Google has refused to use them.

The Three Documented Contradictions

The following are not allegations they are records verifiable in Google's own infrastructure:

1. The April 18, 2026 Security Alert

On April 6, 2026, Google's Tier 3 support agent Sonu Sharma told the Better Business Bureau in a formal written response (BBB Complaint No. 24589850) that Google was "unable to authenticate" my account and could take no further action.

Twelve days later on April 18, 2026, at 5:54 PM — Google's own automated infrastructure sent a Critical Security Alert to jeremy@segwayjeremy.com from no-reply@accounts.google.com. The email explicitly stated: "jeremy@segwayjeremy.com is the recovery email for this account."

Google's own servers recognized the recovery email, identified it correctly, and used it for outbound security communications. The pathway functions. Google used it for every purpose except the one its published documentation says it is for. Whats worse is that it appears Google actively stopped security emails to that address post service potentially constituting spoilation.

2. The WHOIS / DNS Ownership Records

Google's Workspace support system itself confirmed my ownership of segwayjeremy.com. On June 20, 2026, Google sent the following automated communication:

"We are reaching out to you on behalf of jeremy@segwayjeremy.com who identified themselves as an employee within your organization and wishes to contact you about obtaining super administrator access to your Google Workspace account for segwayjeremy.com. Please be aware that the user has proven ownership to the DNS domain name segwayjeremy.com..."

Google's own Workspace infrastructure authenticated my DNS ownership of segwayjeremy.com, the domain hosting the very recovery email Google's Tier 3 agent told the BBB it could not use to authenticate me. That authentication denial is not defensible against the backdrop of Google's own systems confirming DNS ownership. Additionally Googles Counsel has refused to respond to my preservation request on that account for a full business week now creating extra potential legal exposure.

It is worth noting that I made the Whois records public and so you can verify that the domain has been registered to me since 2023 and was originally registered under my Google Voice number on haterfactory2@gmail.com (which also still forwards to the number on my signature) and an address in Portland your records should show I had in billing back in 2021-2023. All of this has been communicated to outside counsel.

3. Continued Active Communications to the Disputed Account

Following service of this lawsuit, Google has continued to send personalized administrative emails including Workspace setup recommendations and support ticket follow-ups (Case No. 72486277) to jeremy@segwayjeremy.com. Google's infrastructure is actively recognizing, routing to, and treating that account as a live, functional Workspace subscription. Google cannot simultaneously contend it cannot authenticate me through that address while its own systems use it as a live administrative contact.

The Service Defect Creating a Technical Default

I want to make you aware of a procedural issue that you as General Counsel should have visibility into regardless of how your outside counsel characterizes it.

Google's Answer was served by mail. Under California Code of Civil Procedure § 1013(a), service by mail adds five calendar days to all response and deadline calculations. California Rules of Court do not permit a defendant who was personally served to use mail service for the Answer and receive the benefit of the standard 30-day window without that five-day addition. The proof of service on the Answer reflects mail service. The Answer was therefore not timely served under the operative statutory framework, creating a technical default that has been documented in the case record. While California has a strong preference towards grace on such things to try on merits its still a terrible look for Google that its BigLaw counsel couldn't even follow basic service rules creating an indisputable technical default even if one that will ultimately end in judicial grace.

I raise this not as a threat but because the decision to serve by mail rather than electronically, on a case involving a pro se plaintiff who explicitly provided electronic contact information, is the kind of procedural choice that should be reviewed at the GC level, particularly given the other circumstances of how this case has been managed. The fact that counsel hasn't even communicated once even to request electronic service, something my history shows I consent to once requested also doesn't look good.

What Is Happening in a Related Case And Why It Matters Here

I have a pending appeal at the Ninth Circuit: Ryan v. X Corp., Case No. 25-4162. Briefing completed in late November 2025. That appeal is now more than 200 days past full submission — well beyond the statistical average for cases the Ninth Circuit intends to resolve by memorandum disposition on straightforward grounds.

The core legal theory in that appeal is that a platform's own published promises about account access and processes fall outside Section 230 immunity and are enforceable under California law, including the UCL. That theory maps directly onto the claims I am pursuing against Google here. Google publicly represented in its support documentation that recovery email exists specifically for users who are "accidentally locked out." Its own infrastructure confirmed on April 18, 2026 that the recovery email was correctly configured. Yet Google refused to use it while continuing to charge my PayPal account for subscriptions I could not access or cancel.

When the Ninth Circuit rules in Ryan v. X Corp. and the timeline strongly suggests that ruling is imminent the press attention that will follow will naturally extend to this case. A pro se plaintiff even partially prevailing against X Corp. in the Ninth Circuit is a significant story. The Google case, with its documented infrastructure contradictions, its technical default, and its preservation notice that has gone unacknowledged for over a week, will be part of that story if this case is still in active litigation when the ruling issues.

Why I Am Writing to You Directly

I want to be candid about my reason for this communication. I am not circumventing the litigation process, I am informing the client of facts that, in my experience, outside counsel may not have fully communicated. I have seen how this pattern plays out. In another of my active cases, Ryan v. Crypto.com (San Diego County), a similarly incomplete picture was delivered to the opposing party by counsel, resulting in a fraud on the court finding that is now scheduled for hearing on August 28, 2026. I am not suggesting that outcome is inevitable here. I am suggesting you should have independent visibility into the factual record before external circumstances make that conversation more complicated.

I am not attaching a settlement demand to this letter. I am asking only whether Google has interest in a direct conversation before the Ninth Circuit ruling changes the landscape. I am available at 858-327-1144 or jeremynftdemon.com.

You are entitled to make that decision with complete information. This letter is intended to ensure you have it.

Respectfully,

Jeremy Ryan/NFT Demon
Founder and CEO
NFT Demon Holdings LLC
858-327-1144
linktr.ee/nftdemon

ALERT: IMPACTS FROM THE WORLD SOCCER TOURNAMENT HELD IN MAJOR CITIES THROU...

USPS Tracking®

FAQs ›

Remove ✕

Tracking Number:

9207190142980485396997

Copy **Add to Informed Delivery**

Latest Update

Your item was delivered to an individual at the address at 11:04 am on July 6, 2026 in MOUNTAIN VIEW, CA 94043.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

MOUNTAIN VIEW, CA 94043
July 6, 2026 11:04 AM

See All Tracking History

What Do USPS Tracking Statuses Mean?

Text & Email Updates ⌄

USPS Tracking Plus® ⌄

Product Information ⌄

See Less ⌃

Exhibit 5

14364041.1.1fdx-18

ORIGIN ID:SCFA (417) 591-9211
JEREMY RYAN

4075 PARK BLVD
102-165
SAN DIEGO, CA 92103
UNITED STATES US

SHIP DATE: 06JUL26
ACTWGT: 0.10 LB
CAD: 265453633/FAPI2208

BILL SENDER

TO **GOOGLE LEGAL**
ATTN: HALIMAH DELAINE PRADO
1600 AMPHITHEATRE PARKWAY

MOUNTAIN VIEW CA 94043

(417) 591-9211 REF: 1
INV: 14364041
PO: DEPT:

58KJ2/DC4A/484B

FedEx Express

E

J261026012001uv

WED - 08 JUL 5:00P

**** 2DAY ****

TRK# 0201 **8739 9565 2175**

DSR

94043

CA-US SJC

SP NUQA

4364041
00001

Hello Google,

This communication pertains to my current case against you Santa Clara County Case #26CV488743. If this is timed correctly you should be receiving it on Wednesday whereas you should have received my previous communication and CLRA notice on Monday. By now you probably also realize that set one of discovery is due Friday. I have included that packet in this communication in case Wilson Sonsini arrogant pride has left you unaware of how precisely surgical it is. I made some statements in my last letter and I hope by now you have worked into your risk calculations the complete loss of control Wilson Sonsini has walked you into in this case as well as the parallel to how my crypto.com case in San Diego begun (San Diego County Superior Court Case #25CU054346C).

I decided to send a follow up letter so you can understand better the current landscape as well as ensure you are correctly informed of the landmines Wilson Sonsini has already walked you through and continues to by their extraordinarily unprofessional conduct. Let's start with the beginning. Everything they have served has been served by mail because they are too prideful or otherwise falsely under the impression that lack of communication is a winning strategy with me. As the Crypto.com case will show you, I not only take a scalpel to the words of all filings but also the procedure. Due to their inability to even ask for consent for electronic service and their lack of insight to use personal service this case started out on a technical default. And while judicial grace will allow it to be tried on the merits, its a terrible look for Google starting out on a default.

Additionally, the refusal to communication has entered potential spoilation risks and the certainty that the bad faith will be noticed at the next case management conference. Additionally, they have failed you miserably by focusing their primary defense around character attacks in my criminal case (8:26-cr-00041 Middle District of Florida). I invite your risk managers to pull docket number 47 or 48 (the clerk entered it twice its the same document) to see just how dangerous that strategy is on multiple fronts. First, that case isn't what they made it out to be and its only a matter of time before it ends in a dismissal or acquittal. But more importantly its a 1st Amendment retaliation case for exposing close associates of Jeffrey Epstein making it a ticking time bomb for PR.

But going further your outside counsel, prior to making such a ridiculous argument, failed to research the judge. This isn't an oversight I made. Had they done so they would realize that he is a former prosecutor but also federal defender. Thats not to say he will not make fair rulings simply that the defense that a federal court in Florida would order the Marshals to transport seized property to San Diego so I can log into my Google account is absolutely absurd. A first year law student would know that. A former Federal Defender even moreso. But a former Federal Defender would be more likely than anyone to understand the concept of innocent until proven guilty as well as how irrelevant a case about press articles pertaining to Epstein associates is to a claim about false advertising and unfair competition among other things (including the newly passed automatic renewal bill that went into effect last year).

But one other thing to keep in mind is the massive disadvantage their lack of communication has already put you in. If you look at the docket of this case Ryan v Google LLC in Santa Clara County you will see that they already lost entire control. And its so extreme they could only produce a 5 page response, unlawfully served by mail without adding the mandatory 5 days required under CCP § 1013(a) for mail service thereby locking a technical default into your own responsive footprint., and waived all ability to demurrer. They are likely telling you this is a common pro se dispute but the docket itself proves it isn't and they know it. The attorneys in the crypto.com case have similar assurances and now they are facing a FTX like contagion after August 28th due to those false assurances. And while you may not have licenses that will globally get wiped away with a fraud on the court ruling, your risk managers know that letting a turnkey, un-rebutted blueprint under the 2025 California Automatic Renewal Law (AB 2863) mature on a wide-open public docket is exactly how a single consumer action triggers systemic platform liability which can wipe billions of dollars off the market cap of a company of your size.

You may also want to look at my case in the Ninth Circuit, Ryan v X Corp. (25-4162). As you will see that has been fully briefed since November, over 200 days. It also parallels this case in many ways. A boilerplate dismissal on Section 230 or TOS grounds would likely already have occurred if it was going to. But even a partial win in that case, particularly pro se on the appellate level, would draw massive attention to all of my open cases. That exposure may want to be weighed in this case. I also have numerous civil cases regarding different aspects (including the unlawful detention of my devices) of my current criminal case in the Southern District of California as well as one in the District of DC.

In short, with probably less than 2 days until discovery is due, it may be wise for you to get a full picture before signing off on whatever Wilson Sonsini intends to send over. I also again invite you to look at the full picture in regards to risk assessment which includes pulling the above mentioned dockets. I would also strongly advise, should you decide to continue, that you switch out counsel. Wilson Sonsini has already wildly lost control of the case, caused a technical default, and refused to even acknowledge a preservation request. All because their egos wouldn't allow them to request electronic service consent to a pro se plaintiff who gained control of the case instantly. Or to communicate at all. The ironic part is, if you look at my Solana Labs case, where Nagy, Wolfe, and Appleton are counsel, a much more prestigious firm than Wilson Sonsini, none of these issues have been had because they communicate.

If you intend to continue with Wilson Sonsini and eventually wish to enter settlement discussions please note that their unprofessional and disrespectful communication patterns will not only raise the floor of any acceptable resolution but will also be flagged at every possible opportunity to the judge as evidence of bad faith. If you would like to enter good faith discussions on resolution before they inevitably dig a deeper hole with whatever they intend to use to respond to discovery which is due Friday (yes this Friday July 10th), I am open to discuss a mutual agreement to extend the discovery deadline if you agree to enter respectful and professional counsel whether in house or outside and get rid of current counsel. I have enclosed the discovery packet so you can compare it against the case, my previous letter, my CLRA notice, and make a sound decision that isn't driven by parties with financial motivation in continuing this. My lines remain open.

Sincerely,

Jeremy Ryan

4075 Park Blvd #102-165

San Diego, CA 92103

jeremy@nftdemon.com or my recovery email jeremy@segwayjeremy.com

858-327-1144

JEREMY RYAN
4075 Park Blvd #102-165
San Diego, CA 92103
858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN, Case No.: 26CV488743
Plaintiff,
v.
GOOGLE LLC,
Defendant.

PLAINTIFF'S REQUESTS FOR
PRODUCTION OF DOCUMENTS,
SET ONE

Dept.: 6
Judicial Officer: Hon. Rafael Sivilla-Jones

PROPOUNDING PARTY: Plaintiff Jeremy Ryan
RESPONDING PARTY: Defendant Google LLC
SET NUMBER: One

Pursuant to California Code of Civil Procedure sections 2031.010 et seq., Plaintiff Jeremy Ryan requests that Defendant Google LLC produce for inspection and copying the documents and things described below within 30 days of service of this request.

DEFINITIONS

1. "GOOGLE" means Defendant Google LLC, its officers, directors, employees, agents, representatives, predecessors, successors, subsidiaries, and all persons acting on its behalf.

2. "ACCOUNT(S)" means the Google accounts haterfactory2@gmail.com and haterfactory@gmail.com, individually and collectively.

3. "PLAINTIFF" means Jeremy Ryan.

4. "LOCKOUT DATE" means January 22, 2026.

5. "RECOVERY EMAIL" means any email address designated as a recovery or backup email address for either Account, including but not limited to jeremy@segwayjeremy.com and jryan_winston@yahoo.com.

6. "DOCUMENT" has the broadest meaning permitted under California law and includes all writings, recordings, emails, text messages, logs, system records, internal communications, policies, training materials, database entries, metadata, and electronically stored information.

7. "PURCHASE" means any charge, subscription, renewal, purchase, in-app purchase, or recurring billing transaction associated with either Account, whether billed through PayPal, a credit card, debit card, Google Play, Google One, direct billing, carrier billing, or any other payment method or platform.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All account logs, system records, and audit entries for haterfactory2@gmail.com from account creation through the date of this request, including login history, device history, IP address history, and any automated system actions taken on the account.

REQUEST FOR PRODUCTION NO. 2:

All account logs, system records, and audit entries for haterfactory@gmail.com from account creation through the date of this request, including login history, device history, IP address history, and any automated system actions taken on the account.

REQUEST FOR PRODUCTION NO. 3:

All logs, records, and system entries reflecting any addition, removal, or modification of recovery phone numbers or recovery email addresses for haterfactory2@gmail.com from account creation through the date of this request, including the date, time, method, and IP address associated with each change.

REQUEST FOR PRODUCTION NO. 4:

All logs, records, and system entries reflecting any addition, removal, or modification of recovery phone numbers or recovery email addresses for haterfactory@gmail.com from account creation through the date of this request, including the date, time, method, and IP address associated with each change.

REQUEST FOR PRODUCTION NO. 5:

All records related to the number porting request for telephone number 608-630-4975 into Google Voice, including the original porting request, carrier verification records, number transfer authorization documents, LOA (Letter of Authorization), and any records identifying the requesting party or account holder.

REQUEST FOR PRODUCTION NO. 6:

All records showing what recovery methods — including recovery email addresses and recovery phone numbers — were configured on haterfactory2@gmail.com as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 7:

All records showing what recovery methods — including recovery email addresses and recovery phone numbers — were configured on haterfactory@gmail.com as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 8:
The complete outbound email logs and system records showing the Critical Security Alert sent on April 18, 2026 at approximately 5:54 PM to jeremy@segwayjeremy.com, including the system or process that generated the alert, the content of the alert, and all metadata associated with that transmission.

REQUEST FOR PRODUCTION NO. 9:
All records, logs, and internal communications showing when and why Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com ceased after service of this lawsuit on Google LLC.

REQUEST FOR PRODUCTION NO. 10:
All internal communications — including emails, Slack messages, tickets, or any other messaging format — regarding Plaintiff's accounts, Plaintiff's lockout, or Plaintiff's account recovery attempts from January 22, 2026 through the date of this request.

REQUEST FOR PRODUCTION NO. 11:
All records related to BBB Complaint No. 24589850, including internal escalation records, communications between Google employees about the complaint, the complete case file, and all communications sent to or received from the Better Business Bureau in connection with that complaint.

REQUEST FOR PRODUCTION NO. 12:
All billing records showing every charge made to any payment method associated with haterfactory2@gmail.com — including Plaintiff's PayPal account and any credit or debit card on file — from January 22, 2026 through the date of this request.

REQUEST FOR PRODUCTION NO. 13:
All billing records showing every charge made to any payment method associated with haterfactory@gmail.com from account creation through the date of this request.

REQUEST FOR PRODUCTION NO. 14:
All records showing any attempt by Google to cancel, pause, or flag for cancellation any subscription associated with haterfactory2@gmail.com after January 22, 2026.

REQUEST FOR PRODUCTION NO. 15:
All records showing any chargeback, dispute, or payment reversal filed in connection with any subscription charge on haterfactory2@gmail.com after January 22, 2026, and Google's response to each such dispute.

REQUEST FOR PRODUCTION NO. 16:

Google's internal policies, procedures, training materials, and guidelines governing account recovery for users who have a recovery email address on file and are locked out of their account, in effect as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 17:
Google's internal policies, procedures, training materials, and guidelines governing when Google's automated account recovery system uses recovery email as a verification method versus when it does not, in effect as of January 22, 2026.

REQUEST FOR PRODUCTION NO. 18:
All versions of Google's published consumer-facing documentation regarding recovery email, including pages at support.google.com/accounts/answer/7682439, support.google.com/accounts/answer/183723, and myaccount.google.com/intro/recovery/email, as they existed on January 22, 2026.

REQUEST FOR PRODUCTION NO. 19:
All documents sufficient to identify every Google employee who reviewed, accessed, or made any decision about Plaintiff's accounts after January 22, 2026.

REQUEST FOR PRODUCTION NO. 20:
All support tickets, case records, and internal escalation records opened in connection with Plaintiff's account recovery requests, including the complete support case referenced as Case ID 5-0866000040996.

REQUEST FOR PRODUCTION NO. 21:
All communications between any Google employee and any third party — including Wilson Sonsini Goodrich & Rosati — regarding Plaintiff's accounts, Plaintiff's claims, or the litigation in Case No. 26CV488743 from January 22, 2026 through the date of this request.

REQUEST FOR PRODUCTION NO. 22:
All versions of Google's Terms of Service, Google One Terms of Service, and Google Play Terms of Service applicable to Plaintiff's accounts as of January 22, 2026, including all terms governing account recovery, account access, subscription cancellation, and billing during account lockout.

REQUEST FOR PRODUCTION NO. 23:
All records sufficient to show the total amount charged to Plaintiff's PayPal account and any credit or debit card on file for subscriptions associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request, including subscription name, charge amount, and charge date.

REQUEST FOR PRODUCTION NO. 24:

All records showing any action taken by Google to modify, restrict, or alter any setting on haterfactory2@gmail.com or haterfactory@gmail.com after service of this lawsuit, including any modification to recovery email settings or security alert delivery settings.

REQUEST FOR PRODUCTION NO. 25:
All documents reflecting Google's litigation hold or preservation notice issued in connection with Case No. 26CV488743, including the date issued, the recipients, and the categories of documents subject to the hold.

REQUEST FOR PRODUCTION NO. 26:
All records showing the name, billing address, payment account, and billing contact information for every purchase, subscription, renewal, or recurring charge associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request, regardless of payment method.

REQUEST FOR PRODUCTION NO. 27:
All records showing the name, billing address, payment account, and billing contact information for every purchase, subscription, renewal, or recurring charge associated with haterfactory@gmail.com from account creation through the date of this request, regardless of payment method.

REQUEST FOR PRODUCTION NO. 28:
All records identifying any billing address, name, or contact information Google associates with any payment method used for purchases, subscriptions, or recurring charges on either Account.

JEREMY RYAN
4075 Park Blvd #102-165
San Diego, CA 92103
858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN, Case No.: 26CV488743
Plaintiff,
v. DISCOVERY REQUESTS
SET ONE
GOOGLE LLC,
Defendant.
Dept.: 6
Judicial Officer: Hon. Rafael Sivilla-JonesPROPOUNDING PARTY: Plaintiff Jeremy Ryan
RESPONDING PARTY: Defendant Google LLC
SET NUMBER: One

Pursuant to California Code of Civil Procedure sections 2030.010 et seq., Plaintiff Jeremy Ryan propounds the following Special Interrogatories to Defendant Google LLC. Defendant is required to respond in writing under oath within 30 days of service.

DEFINITIONS

The definitions set forth in Plaintiff's Requests for Production, Set One, are incorporated herein by reference.

SPECIAL INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

IDENTIFY every person at Google who reviewed, accessed, or made any decision regarding Plaintiff's account haterfactory2@gmail.com after January 22, 2026, including their name, title, and department.

SPECIAL INTERROGATORY NO. 2:

IDENTIFY every person at Google who reviewed, accessed, or made any decision regarding Plaintiff's account haterfactory@gmail.com after January 22, 2026, including their name, title, and department.

SPECIAL INTERROGATORY NO. 3:

State in complete detail the factual and technical basis for Google's contention, stated in its April 6, 2026 BBB response, that it was "unable to authenticate" Plaintiff's account, including what authentication methods were presented to Plaintiff and why each was deemed insufficient.

SPECIAL INTERROGATORY NO. 4:

Identify the technical system, process, or software that generated and transmitted the Critical Security Alert sent on April 18, 2026 to jeremy@segwayjeremy.com identifying it as "the recovery email for this account," and state why that same system cannot be used to send an account recovery verification code to the same address.

SPECIAL INTERROGATORY NO. 5:

State whether Google contends that recovery email is optional — meaning Google's automated system has discretion to decline to use it as a verification pathway even when the user has properly configured it — and if so, identify every document, policy, or term that discloses that limitation to consumers.

SPECIAL INTERROGATORY NO. 6:

State the exact date, reason, and technical or policy basis for the cessation of Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com after this lawsuit was served on Google LLC.

SPECIAL INTERROGATORY NO. 7:

State every step Google took to investigate Plaintiff's claims prior to issuing its April 6, 2026 BBB response, including every internal review, escalation, or technical inquiry conducted.

SPECIAL INTERROGATORY NO. 8:

Identify every subscription or recurring charge associated with haterfactory2@gmail.com that was active on January 22, 2026, and state whether each subscription continued to be charged after that date, and if so, through what date.

SPECIAL INTERROGATORY NO. 9:

State the complete factual basis for Google's affirmative defense of statute of limitations as it relates to Plaintiff's claims regarding haterfactory@gmail.com, including the date Google contends Plaintiff's cause or causes of action accrued.

SPECIAL INTERROGATORY NO. 10:

State the complete factual basis for Google's affirmative defense of unclean hands, including every specific act or omission by Plaintiff that Google contends constitutes the basis for that defense and how each act relates directly to the subject matter of this litigation.

SPECIAL INTERROGATORY NO. 11:

State the complete factual basis for Google's affirmative defense of failure to mitigate, including every specific step Google contends Plaintiff could have taken to mitigate damages and why each step was available and reasonably accessible to Plaintiff after January 22, 2026.

SPECIAL INTERROGATORY NO. 12:
Identify every account recovery option that Google contends was available to Plaintiff for haterfactory2@gmail.com after January 22, 2026, and state why each option was accessible to Plaintiff given that Plaintiff's digital devices had been seized.

SPECIAL INTERROGATORY NO. 13:
State the date and method by which telephone number 608-630-4975 was ported into Google Voice, and identify the account holder listed in the porting request for that number.

SPECIAL INTERROGATORY NO. 14:
State whether any Google employee or agent communicated with any federal law enforcement agency regarding Plaintiff's accounts, and if so, identify the agency, the date, and the subject of those communications.

SPECIAL INTERROGATORY NO. 15:
Identify all persons who Google expects to call as witnesses at trial in this matter, and for each person, state the subject matter of their expected testimony.

SPECIAL INTERROGATORY NO. 16:
State the name, billing address, and payment source associated with each purchase, subscription, renewal, or recurring charge Google contends is associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request.

SPECIAL INTERROGATORY NO. 17:
State the name, billing address, and payment source associated with each purchase, subscription, renewal, or recurring charge Google contends is associated with haterfactory@gmail.com from account creation through the date of this request.

JEREMY RYAN
4075 Park Blvd #102-165
San Diego, CA 92103
858-327-1144
jeremy@nftdemon.com

JEREMY RYAN, IN PRO PER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY RYAN, Case No.: 26CV488743
Plaintiff,
v. DISCOVERY REQUESTS
SET ONE
GOOGLE LLC,
Defendant.
Dept.: 6
Judicial Officer: Hon. Rafael Sivilla-JonesPROPOUNDING PARTY: Plaintiff Jeremy Ryan
RESPONDING PARTY: Defendant Google LLC
SET NUMBER: One

Pursuant to California Code of Civil Procedure sections 2033.010 et seq., Plaintiff Jeremy Ryan requests that Defendant Google LLC admit or deny the following within 30 days of service.

NOTE: If Google fails to admit any matter that is later proven true, Plaintiff may seek the costs of proof of that matter pursuant to CCP § 2033.420.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:
Admit that as of January 22, 2026, jeremy@segwayjeremy.com was configured as the recovery email address on file for haterfactory2@gmail.com.

REQUEST FOR ADMISSION NO. 2:
Admit that as of January 22, 2026, jryan_winston@yahoo.com was configured as the recovery email address on file for haterfactory@gmail.com.

REQUEST FOR ADMISSION NO. 3:
Admit that on April 18, 2026, Google's automated infrastructure sent an email to jeremy@segwayjeremy.com from no-reply@accounts.google.com.

REQUEST FOR ADMISSION NO. 4:

Admit that the April 18, 2026 email to jeremy@segwayjeremy.com stated that "jeremy@segwayjeremy.com is the recovery email for this account."

REQUEST FOR ADMISSION NO. 5:
Admit that the April 18, 2026 email to jeremy@segwayjeremy.com was sent twelve days after Google's Tier 3 agent told the BBB that Google was unable to authenticate Plaintiff's account.

REQUEST FOR ADMISSION NO. 6:
Admit that Google continued to charge Plaintiff's PayPal account for subscriptions associated with haterfactory2@gmail.com after January 22, 2026.

REQUEST FOR ADMISSION NO. 7:
Admit that Plaintiff had no ability to cancel subscriptions associated with haterfactory2@gmail.com while locked out of that account.

REQUEST FOR ADMISSION NO. 8:
Admit that Google's published documentation at support.google.com/accounts/answer/7682439 states that a user can recover their account using "a phone number or the recovery email address for the account."

REQUEST FOR ADMISSION NO. 9:
Admit that Google's published documentation at myaccount.google.com/intro/recovery/email states that a recovery email address is set up "in case you accidentally get locked out."

REQUEST FOR ADMISSION NO. 10:
Admit that Google received BBB Complaint No. 24589850 filed by Plaintiff.

REQUEST FOR ADMISSION NO. 11:
Admit that Google issued a formal written response to BBB Complaint No. 24589850 on or about April 6, 2026.

REQUEST FOR ADMISSION NO. 12:
Admit that Google's April 6, 2026 BBB response stated that Google was "unable to authenticate" Plaintiff's account.

REQUEST FOR ADMISSION NO. 13:
Admit that no court order required Google to lock Plaintiff out of haterfactory2@gmail.com or haterfactory@gmail.com.

REQUEST FOR ADMISSION NO. 14:
Admit that Google is not a named victim in United States v. Ryan, No. 8:26-cr-00041-TRB-CPT (M.D. Fla.).

REQUEST FOR ADMISSION NO. 15:

Admit that Google was not ordered by any federal or state court to deny Plaintiff access to his Google accounts.

REQUEST FOR ADMISSION NO. 16:

Admit that telephone number 608-630-4975 was ported into Google Voice by Plaintiff prior to January 22, 2026.

REQUEST FOR ADMISSION NO. 17:

Admit that telephone number 608-630-4975 currently forwards calls to a phone number accessible to Plaintiff.

REQUEST FOR ADMISSION NO. 18:

Admit that Google's automated account recovery system sent security alerts to jeremy@segwayjeremy.com on multiple occasions prior to this lawsuit being served on Google.

REQUEST FOR ADMISSION NO. 19:

Admit that Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com ceased after this lawsuit was served on Google LLC.

REQUEST FOR ADMISSION NO. 20:

Admit that Google's account recovery system has the technical capability to send a verification code to a recovery email address on file for a Google account.

REQUEST FOR ADMISSION NO. 21:

Admit that the Google One AI Ultra subscription associated with haterfactory2@gmail.com was active and being billed as of the date of this request.

REQUEST FOR ADMISSION NO. 22:

Admit that Plaintiff filed a support request with Google regarding access to haterfactory2@gmail.com prior to filing BBB Complaint No. 24589850.

REQUEST FOR ADMISSION NO. 23:

Admit that Google's published Terms of Service do not expressly disclose to consumers that Google's automated recovery system may decline to use a configured recovery email address as a verification pathway.

REQUEST FOR ADMISSION NO. 24:

Admit that Google's preservation obligation in this litigation attached no later than the date this lawsuit was served on Google LLC.

REQUEST FOR ADMISSION NO. 25:

Admit that Google has records reflecting the billing name and billing address associated with purchases, subscriptions, or recurring charges tied to haterfactory2@gmail.com.

REQUEST FOR ADMISSION NO. 26:

Admit that Google has records reflecting the billing name and billing address associated with purchases, subscriptions, or recurring charges tied to haterfactory@gmail.com.

PROOF OF SERVICE

I, Jeremy Ryan, declare:

I am the Plaintiff in the above-entitled action and am over the age of 18 years.
On June 10, 2026, I served the following document(s):

[X] Plaintiff's Requests for Production of Documents, Set One
[X] Plaintiff's Special Interrogatories to Defendant Google LLC, Set One
[X] Plaintiff's Requests for Admission to Defendant Google LLC, Set One

on Defendant Google LLC by causing a true and correct copy to be served by electronic mail on counsel of record:

Matthew Reed
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304
mreed@wsgr.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 10, 2026 at San Diego, California.

/s/ Jeremy Ryan
Jeremy Ryan, Plaintiff In Pro Per

July 08, 2026

Dear Customer,

The following is the proof-of-delivery for tracking number: 873995652175

Delivery Information:

Status:	Delivered	**Delivered To:**	Shipping/Receiving
Signed for by:	N.Fera	**Delivery Location:**	2690 CASEY AVE
Service type:	FedEx 2Day		
Special Handling:	Deliver Weekday; Direct Signature Required		Mountain View, CA, 94043
		Delivery date:	Jul 8, 2026 09:32

Shipping Information:

Tracking number:	873995652175	**Ship Date:**	Jul 6, 2026
		Weight:	0.5 LB/0.23 KG

Recipient:
Google Legal, ATTN: Halimah DeLaine Prado
1600 Amphitheatre Parkway
MOUNTAIN VIEW, CA, US, 94043

Shipper:
Customer Service, LetterStream.com
8551 E Anderson Dr
Scottsdale, AZ, US, 85255

Reference	1
Invoice	14364041

Thank you for choosing FedEx

Exhibit 6

MATTHEW R. REED, State Bar No. 196305
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (866) 974-7329
Email: mreed@wsgr.com

Attorneys for Defendant Google LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

JEREMY RYAN, Plaintiff, v. GOOGLE LLC, Defendant.	Case No. 26CV488743 **DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE** Action Filed: March 6, 2026 Judge: Hon. Rafael Sivilla-Jones

PROPOUNDING PARTY:	Plaintiff Jeremy Ryan
RESPONDING PARTY:	Defendant Google LLC
SET NO.:	One (1)

Pursuant to California Code of Civil Procedure section 2031.210 et seq., Defendant Google LLC ("Google") hereby objects and responds to Plaintiff Jeremy Ryan's Requests for Production of Documents, Set One (the "Requests"), as follows:

PRELIMINARY STATEMENT

These responses are based on information reasonably available to Google as of the date of service, following a reasonable investigation. Google's investigation and discovery are ongoing, and Google reserves the right to amend, supplement, or correct these responses as additional information becomes available, without assuming any obligation to do so.

Google does not concede, and these responses are made without prejudice to and do not concede, that Plaintiff owns, controls, or is an authorized user of the accounts haterfactory2@gmail.com or haterfactory@gmail.com (the "Accounts") or the Google Voice number at issue or of any payment instrument associated with them. Google expressly reserves all rights as to that issue.

No response, objection, or production waives, or shall be construed to waive, any applicable privilege, protection, or objection, including the attorney-client privilege and the work product doctrine, nor deemed an admission of relevancy. The inadvertent production or disclosure of privileged or otherwise protected information is not a waiver, and Google reserves the right to demand the return of any such material.

By responding to, or agreeing to produce documents in response to, any request, Google does not concede that any information or document is relevant, authentic, or admissible, and reserves all objections to the use of any response or document at any hearing or trial. A statement that Google will produce documents does not mean that responsive documents exist, that Google possesses them, or that Google will search every file or source; it means only that Google will produce non-privileged, responsive documents within its possession, custody, and control, if any, located after a reasonable and diligent search, subject to the objections stated herein and to any appropriate protective order. To the extent that the Requests would require the production of information that implicates the personal privacy interests of third parties, including the account holder(s), the parties must implement appropriate protections for personal privacy before Google will produce any materials responsive to these Requests. Any failure of Google to make a specific objection to any specific request is not an admission that documents or information responsive to that request exist.

To the extent responsive documents are withheld on privilege or work product grounds, Google will provide a privilege log in accordance with the Code of Civil Procedure. Google will produce responsive, non-privileged documents, if any, on a rolling basis as they are collected and reviewed.

GENERAL OBJECTIONS

The following General Objections apply to and are incorporated by reference into each and every response as if fully set forth therein. From time to time a specific response may repeat one of these General Objections for emphasis or for some other reason. The failure to repeat a General Objection in a specific response is not a waiver of that objection.

1. Google objects to the Definitions and the requests to the extent they purport to impose obligations beyond, or inconsistent with, the Civil Discovery Act, the California Rules of Court, or the Local Rules of the Superior Court of California, County of Santa Clara.

2. Google objects to the Requests to the extent that they purport to require Google to conduct anything other than a reasonable and diligent search for reasonably accessible files, including electronically-stored information, from accessible sources where responsive documents reasonably would be expected to be found.

3. Google objects to each request to the extent it assumes or characterizes as established that Plaintiff owns, controls, or is an authorized user of the Accounts, the Google Voice number at issue, or of any associated payment instrument. All responses and any production are made without prejudice to that issue.

4. Google objects to each of the Requests to the extent it seeks disclosure of an attorney's legal theories or mental impressions, or information protected by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or statutory or contractual restriction on disclosure. Google will not produce information protected from disclosure under any of the foregoing privileges or doctrines. An inadvertent disclosure of such

information shall not constitute a waiver of any privilege or of any other ground for objection to production, nor shall inadvertent production waive Google's right to object to the use of any such information during any subsequent proceeding.

5. Google objects to each request to the extent it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts.

OBJECTIONS TO DEFINITIONS

The following Objections apply to and are incorporated by reference into each and every response as if fully set forth therein.

1. Google objects to the definition of "GOOGLE" on the grounds that the definition is overbroad, vague and ambiguous, and unduly burdensome. Google further objects to the definition to the extent it seeks information not currently in the possession, custody, or control of Google. For purposes of responding to the Requests, Google will respond on behalf of Google LLC and those authorized agents and employees acting on its behalf and within the scope of their agency or employment.

2. Google objects to the definition of "ACCOUNT(S)" to the extent it assumes or implies that Plaintiff owns, controls, or is an authorized user of the accounts haterfactory2@gmail.com and haterfactory@gmail.com. Google further objects to the definition to the extent it aggregates the two accounts ("individually and collectively"), because it sweeps in the haterfactory@gmail.com account to which Plaintiff alleges he lost access years before his alleged loss of access to the haterfactory2@gmail.com account, and to the extent Plaintiff's claims related to that account are therefore barred by the applicable statute of limitations and by the doctrine of laches.

3. Google objects to the definition of "RECOVERY EMAIL" as vague and overbroad in its use of "any email address designated as a recovery or backup email address" and "including but not limited to," which fail to identify with particularity the addresses and time period at issue.

4. Google objects to the definition of "DOCUMENT" to the extent it exceeds the scope contemplated by the California Code of Civil Procedure, the California Evidence Code, the

Local Rules of the Superior Court of California for the County of Santa Clara, or other applicable law. Google further objects to the definition as overly broad and unduly burdensome to the extent it encompasses information not relevant to the parties' claims or defenses and would require Google to collect, review, and/or produce information that is disproportionate to the needs of this case.

5. Google objects to the definition of "PURCHASE" as vague, ambiguous, and overbroad in its use of "any other payment method or platform," and to the extent it aggregates both Accounts (see the objection to "ACCOUNT(S)" above).

6. Google objects to the defined term "LOCKOUT DATE" to the extent it assumes or implies that Plaintiff was locked out of, or that Google locked Plaintiff out of, either of the Accounts. Google will construe the term to refer to the calendar date January 22, 2026, without conceding any such characterization.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All account logs, system records, and audit entries for haterfactory2@gmail.com from account creation through the date of this request, including login history, device history, IP address history, and any automated system actions taken on the account.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" logs, records, and audit entries from the account's creation through the present, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request as vague and ambiguous in its use of the undefined phrases "audit entries" and "any automated system actions taken on the account." Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google further objects to this Request to the extent the records sought are equally within Plaintiff's possession, custody, or control, to the extent Plaintiff is the owner or an authorized user of the account. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 2:

All account logs, system records, and audit entries for haterfactory@gmail.com from account creation through the date of this request, including login history, device history, IP address history, and any automated system actions taken on the account.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" logs, records, and audit entries from the account's creation through the present, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request as vague and ambiguous in its use of the undefined phrases "audit entries" and "any automated system actions taken on the account." Google objects to this Request concerning haterfactory@gmail.com to the extent Plaintiff's claims regarding that account are barred by the applicable statute of limitations and by the doctrine of laches. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google further objects to this Request to the extent the records sought are equally within Plaintiff's possession, custody, or control, to the extent Plaintiff is the owner or an authorized user of the account. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 3:

All logs, records, and system entries reflecting any addition, removal, or modification of recovery phone numbers or recovery email addresses for haterfactory2@gmail.com from account creation through the date of this request, including the date, time, method, and IP address associated with each change.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" logs, records, and system entries reflecting "any" addition, removal, or modification of recovery phone numbers or recovery email addresses from account creation through the date of the request, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request as unreasonably cumulative and duplicative of Request No. 1, to the extent it seeks the recovery method change records already encompassed by the account logs and automated system actions sought there. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google further objects to this Request to the extent the records sought are equally within Plaintiff's possession, custody, or control, to the extent Plaintiff is the owner or an authorized user of the account. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 4:

All logs, records, and system entries reflecting any addition, removal, or modification of recovery phone numbers or recovery email addresses for haterfactory@gmail.com from account creation through the date of this request, including the date, time, method, and IP address associated with each change.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" records of every recovery method change from the account's creation through the present, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request as unreasonably cumulative and duplicative of Request No. 2, to the extent it seeks the recovery method change records already encompassed by the account logs and automated system actions sought there.

Google objects to this Request concerning haterfactory@gmail.com to the extent Plaintiff's claims regarding that account are barred by the applicable statute of limitations and by the doctrine of laches. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google further objects to this Request to the extent the records sought are equally within Plaintiff's possession, custody, or control, to the extent Plaintiff is the owner or an authorized user of the account. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 5:

All records related to the number porting request for telephone number 608-630-4975 into Google Voice, including the original porting request, carrier verification records, number transfer authorization documents, LOA (Letter of Authorization), and any records identifying the requesting party or account holder.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" records related to the port, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks records not within Google's possession, custody, or control. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the phone number or Accounts. Google further objects to this Request as vague and ambiguous in its use of the undefined terms "carrier verification records," "number transfer authorization documents," and "any records identifying the requesting party or account holder." Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 6:

All records showing what recovery methods — including recovery email addresses and recovery phone numbers — were configured on haterfactory2@gmail.com as of January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as unreasonably cumulative and duplicative of Request Nos. 1 and 3, to the extent the recovery method configuration as of January 22, 2026 is shown by the change records and account records sought there. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google further objects to this Request to the extent the records sought are equally within Plaintiff's possession, custody, or control, to the extent Plaintiff is the owner or an authorized user of the account. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 7:

All records showing what recovery methods — including recovery email addresses and recovery phone numbers — were configured on haterfactory@gmail.com as of January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as unreasonably cumulative and duplicative of Request Nos. 2 and 4, to the extent the recovery method configuration as of January 22, 2026 is shown by the change records and account records sought there. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google further objects to this Request to the extent the records sought are equally within Plaintiff's possession, custody, or control, to the extent Plaintiff is the owner or an authorized user of the account. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 8:

The complete outbound email logs and system records showing the Critical Security Alert sent on April 18, 2026 at approximately 5:54 PM to jeremy@segwayjeremy.com, including the system or process that generated the alert, the content of the alert, and all metadata associated with that transmission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as unduly burdensome, in that responding would require Google to reconstruct the system or process that generated a single automated message and to assemble all associated transmission metadata. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 9:

All records, logs, and internal communications showing when and why Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com ceased after service of this lawsuit on Google LLC.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" records, logs, and internal communications, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks Google's confidential, proprietary, or trade secret information regarding its internal systems, security measures, and account recovery policies and procedures. Google objects to this Request to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 10:

All internal communications — including emails, Slack messages, tickets, or any other messaging format — regarding Plaintiff's accounts, Plaintiff's lockout, or Plaintiff's account recovery attempts from January 22, 2026 through the date of this request.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" internal communications in any messaging format, without limitation as to scope, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request as vague and ambiguous in its use of the undefined phrases "regarding Plaintiff's accounts," "Plaintiff's lockout," and "account recovery attempts." Google objects to this Request to the extent it assumes facts that have not been established, namely that the accounts are Plaintiff's. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Google objects to this Request to the extent it seeks Google's confidential, proprietary, or trade secret information regarding its internal systems, security measures, and account recovery policies and procedures. Google objects to this Request to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 11:

All records related to BBB Complaint No. 24589850, including internal escalation records, communications between Google employees about the complaint, the complete case file, and all communications sent to or received from the Better Business Bureau in connection with that complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" documents related to the Better Business Bureau complaint, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the

Accounts. Google objects to this Request to the extent it seeks documents not within Google's possession, custody, or control. Google further objects to this Request to the extent it seeks documents that are equally available to, and within the possession, custody, or control of, Plaintiff. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 12:

All billing records showing every charge made to any payment method associated with haterfactory2@gmail.com — including Plaintiff's PayPal account and any credit or debit card on file — from January 22, 2026 through the date of this request.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Google objects to this Request as overbroad in scope and time, in that it seeks "all" billing records showing every charge, where documents sufficient to show the relevant charges would suffice. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts or any PayPal account or any credit or debit card on file. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 13:

All billing records showing every charge made to any payment method associated with haterfactory@gmail.com from account creation through the date of this request.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Google objects to this Request as seeking information neither relevant to any claim or defense nor proportional to the needs of the case, in that Plaintiff asserts no claim regarding billing on haterfactory@gmail.com, and to the extent Plaintiff's claims regarding that account are barred by the applicable statute of limitations and by the doctrine of laches. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 14:

All records showing any attempt by Google to cancel, pause, or flag for cancellation any subscription associated with haterfactory2@gmail.com after January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks records of "any" attempt to cancel, pause, or flag a subscription, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request as vague and ambiguous in its use of the undefined term "pause" and phrase "flag for cancellation." Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 15:

All records showing any chargeback, dispute, or payment reversal filed in connection with any subscription charge on haterfactory2@gmail.com after January 22, 2026, and Google's response to each such dispute.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" records of any chargeback, dispute, or payment reversal. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 16:

Google's internal policies, procedures, training materials, and guidelines governing account recovery for users who have a recovery email address on file and are locked out of their account, in effect as of January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that the collection and review of all policies, procedures, training materials, and guidelines related to account recovery applicable to users who have a recovery email address on file would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks Google's confidential, proprietary, or trade secret information regarding its internal systems, security measures, and account recovery policies and procedures, the disclosure of which would compromise the security of those systems and measures; such documents will only be provided, if at all, upon entry of an appropriate protective order. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 17:

Google's internal policies, procedures, training materials, and guidelines governing when Google's automated account recovery system uses recovery email as a verification method versus when it does not, in effect as of January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that the collection and review of all policies, procedures, training materials, and guidelines related to account recovery using recovery email as a verification method would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks Google's confidential, proprietary, or trade secret information regarding its internal systems, security measures, and account recovery policies and procedures, the disclosure of which would compromise the security of those systems and measures; such documents will only be provided, if at all, upon entry of an appropriate protective order. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 18:

All versions of Google's published consumer-facing documentation regarding recovery email, including pages at support.google.com/accounts/answer/7682439, support.google.com/accounts/answer/183723, and myaccount.google.com/intro/recovery/email, as they existed on January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Google objects to this Request as overbroad in that it seeks "all versions" of the documentation. Google objects to this Request as vague and ambiguous in its use of the undefined phrases "all versions" and "published consumer-facing documentation." Google objects to this Request to the extent the documents sought are equally accessible to Plaintiff from a public source, in that the documentation is published and publicly accessible at the cited pages.

Subject to and without waiving the foregoing objections, Google will conduct a reasonable search for final historical versions of the cited pages applicable on January 22, 2026 and produce responsive documents to the extent located.

REQUEST FOR PRODUCTION NO. 19:

All documents sufficient to identify every Google employee who reviewed, accessed, or made any decision about Plaintiff's accounts after January 22, 2026.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" records identifying employees, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks the private information of Google's employees. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 20:

All support tickets, case records, and internal escalation records opened in connection with Plaintiff's account recovery requests, including the complete support case referenced as Case ID 5-0866000040996.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" records of the support case, the collection and review of which would be disproportionate to the needs of the case, where documents sufficient to show the relevant correspondence would suffice. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts.

Subject to and without waiving the foregoing objections, and without conceding that Plaintiff owns or is an authorized user of the Accounts, Google will produce non-privileged records of its support communications with Plaintiff at his e-mail address of record in this litigation concerning access to the account, including the support case referenced as Case ID 5-0866000040996, to the extent located after a reasonable search.

REQUEST FOR PRODUCTION NO. 21:

All communications between any Google employee and any third party — including Wilson Sonsini Goodrich & Rosati — regarding Plaintiff's accounts, Plaintiff's claims, or the litigation in Case No. 26CV488743 from January 22, 2026 through the date of this request.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks "all" communications with counsel and third parties, without limitation as to scope, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 22:

All versions of Google's Terms of Service, Google One Terms of Service, and Google Play Terms of Service applicable to Plaintiff's accounts as of January 22, 2026, including all terms governing account recovery, account access, subscription cancellation, and billing during account lockout.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Google objects to this Request as vague and ambiguous in its use of the undefined phrase "applicable to Plaintiff's accounts." Google objects to this Request to the extent the documents sought are equally accessible to Plaintiff from a public source, in that the operative Terms of Service and product-specific policies are published and publicly accessible. Google further objects to this Request as overbroad and as vague and ambiguous in its use of the undefined phrase "all versions." Google further objects to this Request to the extent it assumes that Plaintiff owns or is an authorized user of the Accounts—a fact Google does not concede.

Subject to and without waiving the foregoing objections, Google will conduct a reasonable search for historical final versions of Google's Terms of Service, Google One Terms of Service, and Google Play Terms of Service applicable as of January 22, 2026 and produce responsive documents.

REQUEST FOR PRODUCTION NO. 23:

All records sufficient to show the total amount charged to Plaintiff's PayPal account and any credit or debit card on file for subscriptions associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request, including subscription name, charge amount, and charge date.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Google objects to this Request as unreasonably cumulative and duplicative of Request No. 12, to the extent it seeks charges on haterfactory2@gmail.com already encompassed by the billing records sought there. Google objects to this Request as vague and ambiguous in its use of the undefined phrase "any credit or debit card on file." Google objects to this Request to the extent it assumes facts that have not been established, namely that the PayPal account or any credit or debit card on file is Plaintiff's. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 24:

All records showing any action taken by Google to modify, restrict, or alter any setting on haterfactory2@gmail.com or haterfactory@gmail.com after service of this lawsuit, including any modification to recovery email settings or security alert delivery settings.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request as overbroad and unduly burdensome, in that it seeks records of "any" action to modify, restrict, or alter "any" setting, without limitation as to scope, the collection and review of which would be disproportionate to the needs of the case. Google objects to this Request to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 25:

All documents reflecting Google's litigation hold or preservation notice issued in connection with Case No. 26CV488743, including the date issued, the recipients, and the categories of documents subject to the hold.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Google objects to this Request as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Request to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 26:

All records showing the name, billing address, payment account, and billing contact information for every purchase, subscription, renewal, or recurring charge associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request, regardless of payment method.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Google objects to this Request as overbroad in scope and time, in that it seeks “all” records of billing identity, where documents sufficient to show the relevant information would suffice. Google objects to this Request as unreasonably cumulative and duplicative of Request No. 12, to the extent the billing identity information appears in the billing records sought there. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 27:

All records showing the name, billing address, payment account, and billing contact information for every purchase, subscription, renewal, or recurring charge associated with haterfactory@gmail.com from account creation through the date of this request, regardless of payment method.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Google objects to this Request as seeking information neither relevant to any claim or defense nor proportional to the needs of the case, in that Plaintiff asserts no claim regarding billing on haterfactory@gmail.com, and to the extent Plaintiff’s claims regarding that account are barred by the applicable statute of limitations and by the doctrine of laches. Google objects to this Request as unreasonably cumulative and duplicative of Request No. 13, to the extent the billing identity information appears in the billing records sought there. Google objects to this Request as vague and ambiguous in its use of the undefined phrase “billing contact information.” Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that

Plaintiff has not established that he owns or is an authorized user of the Accounts. Pursuant to the foregoing objections, Google will not search for or produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 28:

All records identifying any billing address, name, or contact information Google associates with any payment method used for purchases, subscriptions, or recurring charges on either Account.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Google objects to this Request as overbroad in scope and time, in that it seeks "all" records identifying billing information on either account, without limitation as to scope or time. Google objects to this Request as unreasonably cumulative and duplicative of Requests Nos. 26 and 27, to the extent it seeks the same billing identity information sought there. Google objects to this Request on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts. Subject to and without waiving the foregoing objections, Google directs Plaintiff to its responses to RFP Nos. 26 and 27.

Dated: July 14, 2026

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: */s/ Matthew R. Reed*

Attorneys for Defendant Google LLC

VERIFICATION

I, Tal Almogy, declare:

I serve as Senior Product Support Manager at Google LLC. I am authorized to make this verification on its behalf. I have read the foregoing DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE, and know its contents.

The responses were prepared with the assistance of counsel and are based on information and documents assembled by Google's employees and counsel. Not all of the matters stated in the responses are within my personal knowledge; the responses also contain matters of interpretation, legal conclusions, and contentions. I am informed and believe, and on that basis certify, that the matters stated in the responses are true and correct based on information reasonably available to Google following a reasonable investigation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 14, 2026, at Mountain View, California.

Signed by:
Tal Almogy
B6E6DA453E0842F...
Tal Almogy

Exhibit 7

MATTHEW R. REED, State Bar No. 196305
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Attorneys for Defendant Google LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

JEREMY RYAN, Plaintiff, v. GOOGLE LLC, Defendant.	Case No. 26CV488743 **DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S SPECIAL INTERROGATORIES, SET ONE** Action Filed: March 6, 2026 Judge: Hon. Rafael Sivilla-Jones

PROPOUNDING PARTY:	Plaintiff Jeremy Ryan
RESPONDING PARTY:	Defendant Google LLC
SET NO.:	One (1)

Pursuant to California Code of Civil Procedure section 2030.210 et seq., Defendant Google LLC ("Google") hereby objects and responds to Plaintiff Jeremy Ryan's Special Interrogatories, Set One (the "Interrogatories"), as follows:

PRELIMINARY STATEMENT

These responses are based on information reasonably available to Google as of the date of service, following a reasonable investigation. Google's investigation and discovery are ongoing, and Google reserves the right to amend, supplement, or correct these responses as additional information becomes available, without assuming any obligation to do so.

Google does not concede, and these responses are made without prejudice to and do not concede, that Plaintiff owns, controls, or is an authorized user of the accounts haterfactory2@gmail.com or haterfactory@gmail.com (the "Accounts") or the Google Voice number at issue or of any payment instrument associated with them. Google expressly reserves all rights as to that issue.

No response or objection waives, or shall be construed to waive, any applicable privilege, protection, or objection, including the attorney-client privilege and the work product doctrine, nor deemed an admission of relevancy. The inadvertent production or disclosure of privileged or otherwise protected information is not a waiver, and Google reserves the right to demand the return of any such material or to withdraw any such information. No response shall be construed as an admission that any matter stated in an Interrogatory is relevant or admissible, and Google reserves all objections to the use of any response at any hearing or trial.

GENERAL OBJECTIONS

The following General Objections apply to and are incorporated by reference into each and every response as if fully set forth therein. From time to time a specific response may repeat one of these General Objections for emphasis or for some other reason. The failure to repeat a General Objection in a specific response is not a waiver of that objection.

1. Google objects to the Definitions and the Interrogatories to the extent they purport to impose obligations beyond, or inconsistent with, the Civil Discovery Act, the California Rules of Court, or the Local Rules of the Superior Court of California, County of Santa Clara.

2. Unless otherwise stated, Google will construe each Interrogatory to require it to use only reasonable diligence to locate responsive information. Google objects to the Interrogatories to the extent that they purport to require Google to conduct anything other than a reasonable and diligent investigation for readily accessible information where responsive information reasonably would be expected to be found. Any specific Interrogatory that seeks to require Defendants to exceed such an investigation is overly broad and unduly burdensome.

3. Google objects to each Interrogatory to the extent it assumes or characterizes as established that Plaintiff owns, controls, or is an authorized user of the Accounts, the Google Voice number at issue, or of any associated payment instrument. All responses are made without prejudice to that issue.

4. Google objects to each Interrogatory to the extent it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts or the Google Voice number at issue.

5. To the extent that the Requests would require the disclosure of information that implicates the personal privacy interests of third parties, including the account holder(s), the parties must implement appropriate protections for personal privacy before Google will disclose any information implicating those privacy interests.

6. Google objects to each Interrogatory to the extent it seeks disclosure of an attorney's legal theories or mental impressions, or information protected by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or statutory or contractual restriction on disclosure. Google will not provide information protected from disclosure under any of the foregoing privileges or doctrines. An inadvertent disclosure of such information shall not constitute a waiver of any privilege or of any other ground for objection to disclosure of the information, nor shall inadvertent disclosure waive Google's right to object to the use of any such information during any subsequent proceeding.

7. Google objects to each Interrogatory to the extent it references information, documents or things not in Google's possession, custody or control. Google further objects to each

of the Interrogatories to the extent it seeks disclosure of information or evidence not relevant to this proceeding.

OBJECTIONS TO DEFINITIONS

Plaintiff's Special Interrogatories, Set One, incorporate by reference the definitions set forth in Plaintiff's Requests for Production, Set One. The following Objections apply to and are incorporated by reference into each and every response as if fully set forth therein.

1. Google objects to the definition of "GOOGLE" on the grounds that the definition is overbroad, vague and ambiguous, and unduly burdensome. Google further objects to the definition to the extent it seeks information not currently in the possession, custody, or control of Google. For purposes of responding to the Requests, Google will respond on behalf of Google LLC and those authorized agents and employees acting on its behalf and within the scope of their agency or employment.

2. Google objects to the definition of "ACCOUNT(S)" to the extent it assumes or implies that Plaintiff owns, controls, or is an authorized user of the accounts haterfactory2@gmail.com and haterfactory@gmail.com. Google further objects to the definition to the extent it aggregates the two accounts ("individually and collectively"), because it sweeps in the haterfactory@gmail.com account to which Plaintiff alleges he lost access years before his alleged loss of access to the haterfactory2@gmail.com account, and to the extent Plaintiff's claims related to that account are therefore barred by the applicable statute of limitations and by the doctrine of laches.

3. Google objects to the definition of "RECOVERY EMAIL" as vague and overbroad in its use of "any email address designated as a recovery or backup email address" and "including but not limited to," which fail to identify with particularity the addresses at issue.

4. Google objects to the definition of "DOCUMENT" to the extent it exceeds the scope contemplated by the California Code of Civil Procedure, the California Evidence Code, the Local Rules of the Superior Court of California for the County of Santa Clara, or other applicable law. Google further objects to the definition as overly broad and unduly burdensome to the extent it encompasses information not relevant to the parties' claims or defenses and would require

Google to collect, review, and/or produce information that is disproportionate to the needs of this case.

5. Google objects to the definition of "PURCHASE" as vague, ambiguous, and overbroad in its use of "any other payment method or platform," and to the extent it aggregates both Accounts (see the objection to "ACCOUNT(S)" above).

6. Google objects to the defined term "LOCKOUT DATE" to the extent it assumes or implies that Plaintiff was locked out of, or that Google locked Plaintiff out of, either of the Accounts. Google will construe the term to refer to the calendar date January 22, 2026, without conceding any such characterization.

RESPONSES AND OBJECTIONS TO SPECIAL INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

IDENTIFY every person at Google who reviewed, accessed, or made any decision regarding Plaintiff's account haterfactory2@gmail.com after January 22, 2026, including their name, title, and department.

RESPONSE TO SPECIAL INTERROGATORY NO. 1:

Google objects to this Interrogatory as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Interrogatory to the extent it presupposes that the review of, access to, or any decision regarding the account was undertaken by a natural person, where such functions are performed by automated systems; Google does not concede that any natural person reviewed, accessed, or made any decision regarding the account. Google objects to this Interrogatory as overbroad and unduly burdensome, in that it seeks the identity of "every" employee, a response to which would be disproportionate to the needs of the case. Google further objects to this Interrogatory as vague and ambiguous in its use of the terms "reviewed," "accessed," and "made any decision." Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the account. Pursuant to the foregoing objections, Google will not provide a response to this Interrogatory.

SPECIAL INTERROGATORY NO. 2:

IDENTIFY every person at Google who reviewed, accessed, or made any decision regarding Plaintiff's account haterfactory@gmail.com after January 22, 2026, including their name, title, and department.

RESPONSE TO SPECIAL INTERROGATORY NO. 2:

Google objects to this Interrogatory as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Interrogatory to the extent it presupposes that the review of, access to, or any decision regarding the account was undertaken by a natural person, where such functions are performed by automated systems; Google does not concede that any natural person reviewed, accessed, or made any decision regarding the account. Google objects to this Interrogatory as overbroad and unduly burdensome, in that it seeks the identity of "every" employee, a response to which would be disproportionate to the needs of the case. Google further objects to this Interrogatory as vague and ambiguous in its use of the terms "reviewed," "accessed," and "made any decision." Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the account. Pursuant to the foregoing objections, Google will not provide a response to this Interrogatory.

SPECIAL INTERROGATORY NO. 3:

State in complete detail the factual and technical basis for Google's contention, stated in its April 6, 2026 BBB response, that it was "unable to authenticate" Plaintiff's account, including what authentication methods were presented to Plaintiff and why each was deemed insufficient.

RESPONSE TO SPECIAL INTERROGATORY NO. 3:

Google objects to this Interrogatory as seeking information neither relevant to any claim or defense nor proportional to the needs of the case. Google objects to this Interrogatory to the extent it seeks Google's confidential, proprietary, or trade secret information regarding its internal systems, security measures, and account recovery policies and procedures, specifically the authentication methods and security analysis Google applies to account access requests. Google further objects to this Interrogatory to the extent it seeks information in Plaintiff's knowledge or control, including "what authentication methods were presented to Plaintiff." Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the account. Google further objects to this Interrogatory as overbroad and unduly burdensome in demanding that Google state the basis for its statement "in complete detail."

Subject to and without waiving its objections, Google responds as follows: Google directs Plaintiff to Google's publicly available Help Center documentation regarding sign-in and account recovery, including "How to recover your Google Account or Gmail" (https://support.google.com/accounts/answer/7682439) and "Tips to complete account recovery steps" (https://support.google.com/accounts/answer/7299973). Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement its response.

SPECIAL INTERROGATORY NO. 4:

Identify the technical system, process, or software that generated and transmitted the Critical Security Alert sent on April 18, 2026 to jeremy@segwayjeremy.com identifying it as "the recovery email for this account," and state why that same system cannot be used to send an account recovery verification code to the same address.

RESPONSE TO SPECIAL INTERROGATORY NO. 4:

Google objects to this Interrogatory as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case, in that it seeks an explanation of the reasons behind the design of Google's security and notification systems, which has no bearing on the claims at issue. Google objects to this Interrogatory to the extent it assumes facts that have not been established, namely that recovery using an account recovery code was appropriate in the circumstances presented. Google objects to this Interrogatory to the extent it seeks Google's confidential, proprietary, or trade secret information regarding its internal systems and security measures. Google further objects to this Interrogatory to the extent it seeks information that is publicly available and equally accessible to Plaintiff, including in Google's publicly available Help Center documentation.

Subject to and without waiving its objections, Google states that the operation of its account recovery and security alert functions is described in its publicly available Help Center documentation, including "Respond to security alerts" (https://support.google.com/accounts/answer/2590353), "How to recover your Google Account or Gmail" (https://support.google.com/accounts/answer/7682439), and "Tips to complete account recovery steps" (https://support.google.com/accounts/answer/7299973), and is governed by the operative Google Terms of Service. Whether any particular verification method is available depends upon the circumstances presented. The availability of Google's services is governed by the operative Google Terms of Service and applicable service-specific terms—including the disclaimer of any guarantee that the services will be available. Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement its response.

SPECIAL INTERROGATORY NO. 5:

State whether Google contends that recovery email is optional — meaning Google's automated system has discretion to decline to use it as a verification pathway even when the user has properly configured it — and if so, identify every document, policy, or term that discloses that limitation to consumers.

RESPONSE TO SPECIAL INTERROGATORY NO. 5:

Google objects to this Interrogatory as overbroad in seeking identification of "every document, policy, or term." Google further objects to this Interrogatory to the extent the subpart seeking identification of "every document, policy, or term" calls for a legal conclusion. Google further objects to this Interrogatory as vague and ambiguous in its use of the terms "optional," "discretion," and "properly configured."

Subject to and without waiving its objections, Google states that the operation of its account recovery and security alert functions is described in its publicly available Help Center documentation, including "Respond to security alerts" (https://support.google.com/accounts/answer/2590353), "How to recover your Google Account or Gmail" (https://support.google.com/accounts/answer/7682439), and "Tips to complete account recovery steps" (https://support.google.com/accounts/answer/7299973), and is governed by the operative Google Terms of Service. Whether any particular verification method is available depends upon the circumstances presented. The availability of Google's services is governed by the operative Google Terms of Service and applicable service-specific terms—including the disclaimer of any guarantee that the services will be available. Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement its response.

SPECIAL INTERROGATORY NO. 6:

State the exact date, reason, and technical or policy basis for the cessation of Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com after this lawsuit was served on Google LLC.

RESPONSE TO SPECIAL INTERROGATORY NO. 6:

Google objects to this Interrogatory as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. Google objects to this Interrogatory to the extent it assumes facts that have not been established, namely that the alerts in fact "ceased." Google further objects to this Interrogatory as vague and ambiguous in its use of the term "cessation."

Subject to and without waiving its objections, Google responds as follows: security alerts are generated by automated systems in response to triggering events, such that whether any such alert issues depends on whether those conditions occur. Any absence of such alerts is the consequence of the operation of those systems in the ordinary course. Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement its response.

SPECIAL INTERROGATORY NO. 7:

State every step Google took to investigate Plaintiff's claims prior to issuing its April 6, 2026 BBB response, including every internal review, escalation, or technical inquiry conducted.

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

Google objects to this Interrogatory as seeking information neither relevant to any claim or defense nor proportional to the needs of the case, in that it concerns Google's investigation preceding its response to a Better Business Bureau complaint, which is not at issue in this action. Google objects to this Interrogatory as overbroad and unduly burdensome, in that it seeks "every" step of the pre-response investigation, without limitation, a response to which would be disproportionate to the needs of the case. Google objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Pursuant to the foregoing objections, Google will not provide a response to this Interrogatory.

SPECIAL INTERROGATORY NO. 8:

Identify every subscription or recurring charge associated with haterfactory2@gmail.com that was active on January 22, 2026, and state whether each subscription continued to be charged after that date, and if so, through what date.

RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Google objects to this Interrogatory on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts.

Subject to and without waiving its objections, Google responds as follows: the Interrogatory seeks confirmation of billing and payment information for an account at issue, which implicates the privacy interests of the account's rightful owner and of the holder of the payment instrument. The identity of the account's owner has not been established, and Plaintiff has not established his ownership of the payment instrument. Google cannot provide billing or payment information to a party whose ownership of, and right to access, the account or payment instrument remains unproven, as doing so would disclose sensitive financial information to a potentially unauthorized party.

SPECIAL INTERROGATORY NO. 9:

State the complete factual basis for Google's affirmative defense of statute of limitations as it relates to Plaintiff's claims regarding haterfactory@gmail.com, including the date Google contends Plaintiff's cause or causes of action accrued.

RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Google objects to this Interrogatory as overbroad in demanding the "complete factual basis" for Google's affirmative defense. Google objects to this Interrogatory to the extent it seeks the legal reasoning or theories underlying Google's affirmative defense, which are protected by the attorney-client privilege and the work product doctrine.

Subject to and without waiving its objections, Google responds as to the facts presently known: Plaintiff alleges he lost access to haterfactory@gmail.com "years earlier." Complaint ¶ 5.

Google contends that any claim regarding haterfactory@gmail.com accrued no later than the date Plaintiff allegedly lost access and is time-barred to the extent that date was prior to the applicable limitations periods. Google further contends that Plaintiff unreasonably delayed and acquiesced in the loss of access, taking no action for years with knowledge that he could not access the account. The precise date and circumstances of Plaintiff's loss of access are within Plaintiff's knowledge. Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement.

SPECIAL INTERROGATORY NO. 10:

State the complete factual basis for Google's affirmative defense of unclean hands, including every specific act or omission by Plaintiff that Google contends constitutes the basis for that defense and how each act relates directly to the subject matter of this litigation.

RESPONSE TO SPECIAL INTERROGATORY NO. 10:

Google objects to this Interrogatory as overbroad in demanding the "complete factual basis" for Google's affirmative defense and "every specific act or omission" on which it rests. Google objects to this Interrogatory to the extent it seeks the legal reasoning or theories underlying Google's affirmative defense, which are protected by the attorney-client privilege and the work product doctrine.

Subject to and without waiving its objections, Google responds as to the facts presently known: based on Plaintiff's allegations in this action and the information available on the public docket in *United States v. Ryan*, No. 8:26-cr-00041-TPB-CPT (M.D. Fla.), a criminal case in which Plaintiff is the defendant, Plaintiff's claimed injuries here arise from Plaintiff's arrest on January 22, 2026 and the seizure of his devices in connection with that criminal proceeding. Pending trial, Plaintiff was released from custody and permitted the use of one approved device with computer monitoring, and thereafter used that device to conduct searches and send communications concerning the prosecutor, the victim, a witness, and the court, after which the court imposed release conditions restricting his ability to perform internet searches and to make posts concerning the victim or witness and their family members, law enforcement officials, judicial officers and their families, companies associated with the victim or witness, and agencies with which those companies contract. Google's investigation and discovery are ongoing, including as to matters at issue in the criminal proceeding, and Google reserves the right to amend or supplement.

SPECIAL INTERROGATORY NO. 11:

State the complete factual basis for Google's affirmative defense of failure to mitigate, including every specific step Google contends Plaintiff could have taken to mitigate damages and why each step was available and reasonably accessible to Plaintiff after January 22, 2026.

RESPONSE TO SPECIAL INTERROGATORY NO. 11:

Google objects to this Interrogatory as overbroad in demanding the "complete factual basis" for Google's affirmative defense. Google objects to this Interrogatory to the extent it seeks the legal reasoning or theories underlying Google's affirmative defense, which are protected by the attorney-client privilege and the work product doctrine, and as overbroad in seeking "every specific step." Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the Accounts.

Subject to and without waiving its objections, Google responds as to the facts presently known: following his arrest on January 22, 2026, Plaintiff was permitted the use of one device with computer monitoring. Reasonable steps available to Plaintiff after January 22, 2026 include but are not limited to (i) requesting momentary access to the seized device(s) from the federal authorities or the Florida criminal court in order to authenticate; (ii) authorizing his public defender or law enforcement to access the device(s) to facilitate authentication; (iii) using standard authentication methods, including an existing trusted device or preconfigured backup codes; and (iv) cancelling subscriptions through available means. Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement.

SPECIAL INTERROGATORY NO. 12:

Identify every account recovery option that Google contends was available to Plaintiff for haterfactory2@gmail.com after January 22, 2026, and state why each option was accessible to Plaintiff given that Plaintiff's digital devices had been seized.

RESPONSE TO SPECIAL INTERROGATORY NO. 12:

Google objects to this Interrogatory as overbroad in seeking “every” recovery option. Google objects to this Interrogatory to the extent it seeks the legal reasoning or theories underlying Google’s contentions, which are protected by the attorney-client privilege and the work product doctrine. Google further objects to this Interrogatory to the extent it implies that Google has any obligation to ensure access to the Accounts even in the face of seizure of Plaintiff’s devices in his criminal proceeding, including because Google’s Terms of Service expressly disclaim any guarantee of continued availability of its services and because Google was not involved in any such device seizure. Google further objects to this Interrogatory as vague and ambiguous in its use of the phrase “accessible to Plaintiff.” Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the account.

Subject to and without waiving its objections, Google responds that the available recovery methods are those available at Google’s publicly available Help Center, including “How to recover your Google Account or Gmail” (https://support.google.com/accounts/answer/7682439). The specific recovery options available vary based on the circumstances presented but, in any event, remain available subject to Google’s ordinary practices applicable to accounts generally. Google’s investigation and discovery are ongoing, and Google reserves the right to amend or supplement.

SPECIAL INTERROGATORY NO. 13:

State the date and method by which telephone number 608-630-4975 was ported into Google Voice, and identify the account holder listed in the porting request for that number.

RESPONSE TO SPECIAL INTERROGATORY NO. 13:

Google objects to this Interrogatory as seeking information that is neither relevant to any party’s claim or defense nor proportional to the needs of the case. Google objects to this Interrogatory on the basis that it implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts.

Pursuant to the foregoing objections, Google responds as follows: the Interrogatory seeks information about an account at issue, which implicates the privacy interests of the account’s rightful owner. The identity of the account’s owner has not been established. The telephone number 608-

630-4975 was ported into Google Voice prior to January 22, 2026. Google's investigation and discovery are ongoing, and Google reserves the right to amend or supplement.

SPECIAL INTERROGATORY NO. 14:

State whether any Google employee or agent communicated with any federal law enforcement agency regarding Plaintiff's accounts, and if so, identify the agency, the date, and the subject of those communications.

RESPONSE TO SPECIAL INTERROGATORY NO. 14:

Google objects to this Interrogatory as seeking information that is neither relevant to any party's claim or defense nor proportional to the needs of the case, in that it concerns Google's communications, if any, with federal law enforcement regarding a separate criminal matter, which is not at issue in this action. Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the accounts. Google objects to this Interrogatory to the extent it seeks confidential and sensitive law enforcement information. Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the accounts. Pursuant to the foregoing objections, Google will not provide a response to this Interrogatory.

SPECIAL INTERROGATORY NO. 15:

Identify all persons who Google expects to call as witnesses at trial in this matter, and for each person, state the subject matter of their expected testimony.

RESPONSE TO SPECIAL INTERROGATORY NO. 15:

Google objects to this Interrogatory to the extent it seeks material protected by attorney-client privilege or the work product doctrine. Google objects to this Interrogatory as premature, in that Google will identify trial witnesses in accordance with the Court's trial scheduling and disclosure orders and the applicable California Rules of Court and provisions of the Code of Civil Procedure governing the disclosure of trial witnesses. Pursuant to the foregoing objections, Google will not provide a response to this Interrogatory.

SPECIAL INTERROGATORY NO. 16:

State the name, billing address, and payment source associated with each purchase, subscription, renewal, or recurring charge Google contends is associated with haterfactory2@gmail.com from January 22, 2026 through the date of this request.

RESPONSE TO SPECIAL INTERROGATORY NO. 16:

Google objects to this Interrogatory as assuming facts not established and as mischaracterizing Google's position, in that Google asserts no contention that any purchase, subscription, renewal, or recurring charge is "associated with" the account haterfactory2@gmail.com. Google further objects that the Interrogatory implicates the privacy interests of the account holder, Plaintiff not having established that he owns or is an authorized user of the account or of any associated payment instrument.

Subject to and without waiving its objections, and because Google asserts no contention of the kind the Interrogatory presupposes, Google responds to the Interrogatory as a request for the billing name, billing address, and payment source reflected in Google's records for charges billed to haterfactory2@gmail.com from January 22, 2026 through the date of this request. On that understanding, Google responds as follows: the Interrogatory seeks confirmation of billing and payment information for an account at issue, which implicates the privacy interests of the account's rightful owner and of the holder of the payment instrument. The identity of the account's owner has not been established, and Plaintiff has not established his ownership of the payment instrument. Google cannot provide billing or payment information to a party whose ownership of, and right to access, the account remains unproven, as doing so would disclose sensitive financial information to a potentially unauthorized party.

SPECIAL INTERROGATORY NO. 17:

State the name, billing address, and payment source associated with each purchase, subscription, renewal, or recurring charge Google contends is associated with haterfactory@gmail.com from account creation through the date of this request.

RESPONSE TO SPECIAL INTERROGATORY NO. 17:

Google objects to this Interrogatory as assuming facts not established and as mischaracterizing Google's position, in that Google asserts no contention that any purchase, subscription, renewal, or recurring charge is "associated with" the account haterfactory@gmail.com. Google further objects that the Interrogatory seeks information neither relevant to any party's claim or defense nor proportional to the needs of the case, in that Plaintiff asserts no claim regarding billing on haterfactory@gmail.com. Google further objects that, by seeking information "from account creation," it is overbroad and not reasonably limited in time, and to the extent Plaintiff's claims regarding that account are barred by the applicable statute of limitations and by the doctrine of laches. Google further objects that the Interrogatory implicates the privacy interests of the account holder, Plaintiff not having established that he owns or is an authorized user of the account or of any associated payment instrument. Pursuant to the foregoing objections, Google will not provide a response to this Interrogatory.

Dated: July 14, 2026

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: */s/ Matthew R. Reed*

Attorneys for Defendant Google LLC

VERIFICATION

I, Tal Almogy, declare:

I serve as Senior Product Support Manager at Google LLC. I am authorized to make this verification on its behalf. I have read the foregoing DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S SPECIAL INTERROGATORIES, SET ONE, and know its contents.

The responses were prepared with the assistance of counsel and are based on information and documents assembled by Google's employees and counsel. Not all of the matters stated in the responses are within my personal knowledge; the responses also contain matters of interpretation, legal conclusions, and contentions. I am informed and believe, and on that basis certify, that the matters stated in the responses are true and correct based on information reasonably available to Google following a reasonable investigation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 14, 2026, at Mountain View, California.

Signed by:
Tal Almogy
B6E6DA453E0842F...
Tal Almogy

Exhibit 8

MATTHEW R. REED, State Bar No. 196305
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (866) 974-7329
Email: mreed@wsgr.com

Attorneys for Defendant Google LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

JEREMY RYAN, Plaintiff, v. GOOGLE LLC, Defendant.	Case No. 26CV488743 **DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSION, SET ONE** Action Filed: March 6, 2026 Judge: Hon. Rafael Sivilla-Jones

PROPOUNDING PARTY:	Plaintiff Jeremy Ryan
RESPONDING PARTY:	Defendant Google LLC
SET NO.:	One (1)

Pursuant to California Code of Civil Procedure section 2033.210 et seq., Defendant Google LLC ("Google") hereby objects and responds to Plaintiff Jeremy Ryan's Requests for Admission, Set One (the "Requests"), as follows:

PRELIMINARY STATEMENT

These responses are based on information reasonably available to Google as of the date of service, following a reasonable investigation. Google's investigation and discovery are ongoing, and Google reserves the right to amend, supplement, or correct these responses as additional information becomes available, without assuming any obligation to do so.

Google does not concede, and these responses shall not be construed as a concession, that Plaintiff owns, controls, or is an authorized user of the accounts haterfactory@gmail.com or haterfactory2@gmail.com (the "Accounts") or the Google Voice number at issue, or of any payment instrument associated with them. Google expressly reserves all rights as to that issue.

GENERAL OBJECTIONS

The following General Objections apply to and are incorporated by reference into each and every response as if fully set forth therein. From time to time a specific response may repeat one of these General Objections for emphasis or for some other reason. The failure to repeat a General Objection in a specific response is not a waiver of that objection.

1. Google objects to the requests to the extent they purport to impose obligations beyond, or inconsistent with, the Civil Discovery Act, the California Rules of Court, or the Local Rules of the Superior Court of California, County of Santa Clara.

2. Google objects to each request to the extent it assumes or characterizes as established that Plaintiff owns, controls, or is an authorized user of the Accounts, the Google Voice number at issue, or of any associated payment instrument. All responses are made without prejudice to that issue.

3. Google objects to each request to the extent that responding would require Google to disclose information implicating the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the Accounts.

4. To the extent that the Requests would require the disclosure of information that implicates the personal privacy interests of third parties, including the account holder(s), the parties must implement appropriate protections for personal privacy before Google will disclose any information implicating those privacy interests.

5. Google objects to each of the Requests to the extent it seeks disclosure of an attorney's legal theories or mental impressions, or information protected by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or statutory or contractual restriction on disclosure. Google will not provide information protected from disclosure under any of the foregoing privileges or doctrines. An inadvertent disclosure of such information shall not constitute a waiver of any privilege or of any other ground for objection to disclosure of the information, nor shall inadvertent disclosure waive Google's right to object to the use of any such information during any subsequent proceeding.

6. Google objects to each of the Requests for Admission to the extent they reference information, documents or things not in Google's possession, custody or control. Google further objects to each of the Requests to the extent it seeks disclosure of information or evidence not relevant to this proceeding.

7. The Requests for Admission do not set out definitions and do not incorporate the definitions used in the Requests for Production. Google responds to the Requests for Admission based on the ordinary meaning of the terms used.

OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that as of January 22, 2026, jeremy@segwayjeremy.com was configured as the recovery email address on file for haterfactory2@gmail.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Google objects to this Request as vague and ambiguous in its use of the terms "configured" and "on file," and to the extent the term "recovery email address" is used to imply that a configured recovery email address can be used, or is required to be used, as a means or verification pathway to regain access to an account. Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the account.

Google objects to this Request on the basis that it seeks confirmation of the recovery email configuration for an account at issue, which implicates the privacy and security interests of the account's rightful owner. The identity of the account's owner has not been established. Google cannot confirm the account's recovery or security configuration to a party whose ownership of, and right to access, the account remains unproven, as doing so would disclose sensitive account security information to a potentially unauthorized party. Plaintiff's inability to successfully authenticate as the owner of the account is the subject of this action. On this basis, Google can neither admit nor deny the matter asserted.

REQUEST FOR ADMISSION NO. 2:

Admit that as of January 22, 2026, jryan_winston@yahoo.com was configured as the recovery email address on file for haterfactory@gmail.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Google objects to this Request as vague and ambiguous in its use of "configured" and "on file" and to the extent the term "recovery email address" is used to imply that a configured recovery email address can be used, or is required to be used, as a means or verification pathway to regain access to an account. Google further objects that the Request assumes facts not established, namely that Plaintiff owns or is an authorized user of the account. Google further objects to this Request to the extent Plaintiff's claims regarding haterfactory@gmail.com are barred by the applicable statute of limitations and by the doctrine of laches.

Google objects to this Request on the basis that it seeks confirmation of the recovery email configuration for an account at issue, which implicates the privacy and security interests of the account's rightful owner. The identity of the account's owner has not been established. Google cannot confirm the account's recovery or security configuration to a party whose ownership of, and right to access, the account remains unproven, as doing so would disclose sensitive account security information to a potentially unauthorized party. Plaintiff's inability to successfully authenticate as the owner of the account is the subject of this action. On this basis, Google can neither admit nor deny the matter asserted.

REQUEST FOR ADMISSION NO. 3:

Admit that on April 18, 2026, Google's automated infrastructure sent an email to jeremy@segwayjeremy.com from no-reply@accounts.google.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Google objects to this Request as vague and ambiguous in its use of the phrase "automated infrastructure."

Subject to and without waiving its objections, Google admits that the document attached as Exhibit B to the Declaration of Jeremy Ryan in Support of Ex Parte Application for Temporary Restraining Order — Account Recovery Relief, filed June 11, 2026, reflects that a message was sent to jeremy@segwayjeremy.com from no-reply@accounts.google.com on April 18, 2026.

REQUEST FOR ADMISSION NO. 4:

Admit that the April 18, 2026 email to jeremy@segwayjeremy.com stated that "jeremy@segwayjeremy.com is the recovery email for this account."

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Subject to and without waiving its objections, Google admits that the document attached as Exhibit B to the Declaration of Jeremy Ryan in Support of Ex Parte Application for Temporary Restraining Order — Account Recovery Relief, filed June 11, 2026, contains the statement "jeremy@segwayjeremy.com is the recovery email for this account."

REQUEST FOR ADMISSION NO. 5:

Admit that the April 18, 2026 email to jeremy@segwayjeremy.com was sent twelve days after Google's Tier 3 agent told the BBB that Google was unable to authenticate Plaintiff's account.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Google objects to this Request as compound and not relevant to any party's claim or defense. Google further objects to the Request as assuming facts not established, namely that the account is Plaintiff's.

Subject to and without waiving its objections, and responding to each discrete matter separately: Google admits that the document attached as Exhibit B to the Declaration of Jeremy Ryan in Support of Ex Parte Application for Temporary Restraining Order — Account Recovery Relief, filed June 11, 2026, is dated April 18, 2026; Google admits that its written response to BBB Complaint No. 24589850 appearing in the document attached as Exhibit A to that declaration, stated that Google was unable to authenticate the account. Except as expressly admitted, Google denies the Request.

REQUEST FOR ADMISSION NO. 6:

Admit that Google continued to charge Plaintiff's PayPal account for subscriptions associated with haterfactory2@gmail.com after January 22, 2026.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Google objects to this Request as assuming facts not established, namely that Plaintiff owns the PayPal account or the Google account, and as not reasonably limited in time. Google further objects to this Request as vague and ambiguous in its use of the phrase "continued to charge."

Google objects to this Request on the basis that it seeks confirmation of billing and payment information for an account at issue, which implicates the privacy interests of the account's rightful owner and of the holder of the payment instrument. The identity of the account's owner has not been established, and Plaintiff has not established his ownership of the payment instrument. Google cannot confirm billing or payment information to a party whose ownership of, and right to access, the account remains unproven, as doing so would disclose sensitive financial information to a potentially unauthorized party. Google can neither admit nor deny the matter asserted.

REQUEST FOR ADMISSION NO. 7:

Admit that Plaintiff had no ability to cancel subscriptions associated with haterfactory2@gmail.com while locked out of that account.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Google objects to this Request as assuming facts not established, namely that Plaintiff was "locked out" of an account that is his. Google further objects to this Request as vague and ambiguous in its use of the terms "subscriptions," "locked out" and "no ability to cancel." Google further objects to the extent the Request seeks confirmation of information in Plaintiff's knowledge based on Plaintiff's circumstances.

Subject to and without waiving its objections, Google responds that because the request turns on facts concerning Plaintiff's own circumstances rather than any fact reflected in Google's records, Google can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 8:

Admit that Google's published documentation at support.google.com/accounts/answer/7682439 states that a user can recover their account using "a phone number or the recovery email address for the account."

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Google objects to this Request on the ground that the cited documentation is publicly available and speaks for itself.

Subject to and without waiving its objections, Google admits that the cited page exists and states, in a section entitled "Forgot the email address you use to sign in," that a user needs to know "[a] phone number or the recovery email address for the account" and the "full name on [the] account" and then "[f]ollow the instructions to confirm it's your account" to then "find a list of usernames that match your account." Google otherwise denies the Request.

REQUEST FOR ADMISSION NO. 9:

Admit that Google's published documentation at myaccount.google.com/intro/recovery/email states that a recovery email address is set up "in case you accidentally get locked out."

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Google objects to this Request on the ground that the cited documentation is published and publicly accessible and speaks for itself.

Subject to and without waiving its objections, Google denies this Request. The cited page does not state that a recovery email address is set up "in case you accidentally get locked out," and the page speaks for itself.

REQUEST FOR ADMISSION NO. 10:

Admit that Google received BBB Complaint No. 24589850 filed by Plaintiff.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Google objects to this Request as not relevant to any party's claim or defense.

Subject to and without waiving its objections, Google admits that it received BBB Complaint No. 24589850.

REQUEST FOR ADMISSION NO. 11:

Admit that Google issued a formal written response to BBB Complaint No. 24589850 on or about April 6, 2026.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Google objects to this Request as not relevant to any party's claim or defense.

Subject to and without waiving its objections, Google admits that it responded in writing regarding BBB Complaint No. 24589850. Except as expressly admitted, Google denies the Request.

REQUEST FOR ADMISSION NO. 12:

Admit that Google's April 6, 2026 BBB response stated that Google was "unable to authenticate" Plaintiff's account.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Google objects to this Request as assuming facts not established, namely that the account is Plaintiff's.

Subject to and without waiving its objections, Google admits that its written response to BBB Complaint No. 24589850, which appears in the document attached as Exhibit A to the Declaration of Jeremy Ryan in Support of Ex Parte Application for Temporary Restraining Order — Account Recovery Relief, filed June 11, 2026, stated that Google was unable to authenticate the account. Google does not concede that the account is Plaintiff's. Except as expressly admitted, Google denies the Request.

REQUEST FOR ADMISSION NO. 13:

Admit that no court order required Google to lock Plaintiff out of haterfactory2@gmail.com or haterfactory@gmail.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Google objects to this Request as calling for a legal conclusion and as assuming a fact that Google denies, namely that Google “locked Plaintiff out” of the Accounts. Google further objects to this Request as vague and ambiguous in its use of the phrase “lock Plaintiff out.”

Subject to and without waiving its objections, Google admits that it is aware of no court order that “required Google to lock Plaintiff out of haterfactory2@gmail.com or haterfactory@gmail.com.”

REQUEST FOR ADMISSION NO. 14:

Admit that Google is not a named victim in United States v. Ryan, No. 8:26-cr-00041-TRB-CPT (M.D. Fla.).

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

Google objects to this Request as seeking information neither relevant to any party’s claim or defense nor proportional to the needs of the case.

Subject to and without waiving its objections, Google admits that, to its knowledge, it is not a named victim in United States v. Ryan, No. 8:26-cr-00041-TPB-CPT (M.D. Fla.).

REQUEST FOR ADMISSION NO. 15:

Admit that Google was not ordered by any federal or state court to deny Plaintiff access to his Google accounts.

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

Google objects to this Request as calling for a legal conclusion and as assuming a fact that Google denies, namely that Google denied Plaintiff access to the Accounts, and as assuming a fact not established, namely that the accounts at issue are Plaintiff’s.

Subject to and without waiving its objections, Google admits that it is aware of no court order that required Google to deny Plaintiff access to the Accounts.

REQUEST FOR ADMISSION NO. 16:

Admit that telephone number 608-630-4975 was ported into Google Voice by Plaintiff prior to January 22, 2026.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

Google objects to this Request as seeking information neither relevant to any party's claim or defense nor proportional to the needs of the case. Google further objects to this Request as assuming a fact not established, namely that the accounts at issue are Plaintiff's. Google further objects to this Request on the basis that it seeks information about the account and thereby implicates the privacy interests of the account holder, in that Plaintiff has not established that he owns or is an authorized user of the account.

Subject to and without waiving its objections, Google admits that telephone number 608-630-4975 was ported into Google Voice prior to January 22, 2026. Google otherwise denies this Request, including that the porting was performed "by Plaintiff," to the extent that Google cannot know the identity of the natural person who in fact executed the porting.

REQUEST FOR ADMISSION NO. 17:

Admit that telephone number 608-630-4975 currently forwards calls to a phone number accessible to Plaintiff.

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

Google objects to this Request as vague and ambiguous in its use of the phrase "accessible to Plaintiff," which turns on facts concerning Plaintiff's own circumstances rather than any fact reflected in Google's records.

Subject to and without waiving its objections, Google responds that because the request turns on facts concerning Plaintiff's own circumstances rather than any fact reflected in Google's records, the information known or readily obtainable is insufficient to enable Google to admit or deny whether telephone number 608-630-4975 currently forwards to a telephone "accessible to Plaintiff"; on that basis Google can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 18:

Admit that Google's automated account recovery system sent security alerts to jeremy@segwayjeremy.com on multiple occasions prior to this lawsuit being served on Google.

RESPONSE TO REQUEST FOR ADMISSION NO. 18:

Google objects to this Request as vague and ambiguous in its use of the terms "automated account recovery system" and "multiple occasions," as compound, and to the extent it seeks information neither relevant to any claim or defense nor proportional to the needs of the case, in that determining whether, or how many times, automated alerts issued to that address before suit would require a disproportionate review of system logs, to the extent such records exist.

Subject to and without waiving its objections, Google admits that the April 18, 2026 message described in its Response to Request for Admission No. 3 was sent to jeremy@segwayjeremy.com, and that additional security alerts may have been initiated by automated systems in connection with access attempts in the ordinary course of business.

REQUEST FOR ADMISSION NO. 19:

Admit that Critical Security Alerts to jeremy@segwayjeremy.com regarding haterfactory2@gmail.com ceased after this lawsuit was served on Google LLC.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

Google objects to this Request as seeking information neither relevant to any claim or defense nor proportional to the needs of the case, including on the basis that determining whether any particular automated alert issued would require a disproportionate review of system logs, to the extent they exist. Google further objects to this Request as assuming facts not established, and as vague as to the use of the term "ceased."

Subject to and without waiving its objections, Google admits only that security alerts are generated by automated systems in response to triggering events, such that whether any such alert issues depends on whether those conditions occur. Any absence of such alerts is the consequence of the operation of those systems in the ordinary course.

REQUEST FOR ADMISSION NO. 20:

Admit that Google's account recovery system has the technical capability to send a verification code to a recovery email address on file for a Google account.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Google objects to this Request as vague and ambiguous in its use of the terms "account recovery system" and "technical capability."

Subject to and without waiving its objections, Google admits that its account recovery systems are capable of sending a verification code to a recovery email address configured for a Google account. Google otherwise denies the Request, including any implication that doing so was required or appropriate in the circumstances presented.

REQUEST FOR ADMISSION NO. 21:

Admit that the Google One AI Ultra subscription associated with haterfactory2@gmail.com was active and being billed as of the date of this request.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Google objects to this Request as assuming facts not established, namely that the account is Plaintiff's, and as vague and ambiguous in its reference to a "Google One AI Ultra subscription."

Google objects to this Request on the basis that it seeks confirmation of billing and payment information for an account at issue, which implicates the privacy interests of the account's rightful owner and of the holder of the payment instrument. The identity of the account's owner has not been established, and Plaintiff has not established his ownership of the payment instrument. Google cannot confirm billing or payment information to a party whose ownership of, and right to access, the account remains unproven, as doing so would disclose sensitive financial information to a potentially unauthorized party. Google can neither admit nor deny the matter asserted.

REQUEST FOR ADMISSION NO. 22:

Admit that Plaintiff filed a support request with Google regarding access to haterfactory2@gmail.com prior to filing BBB Complaint No. 24589850.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Google objects to this Request as compound. Google further objects to this Request as vague and ambiguous in its use of the phrase “support request.” Google further objects to the extent the Request seeks confirmation of information in Plaintiff’s knowledge based on Plaintiff’s circumstances and interactions with third parties.

Subject to and without waiving its objections, Google responds that because the request turns on facts concerning Plaintiff’s interactions with third parties (i.e., the date Plaintiff in fact filed a BBB complaint) rather than any fact reflected in Google’s records, Google can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 23:

Admit that Google’s published Terms of Service do not expressly disclose to consumers that Google’s automated recovery system may decline to use a configured recovery email address as a verification pathway.

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

Google objects to this Request as assuming facts not established, namely that any particular recovery method was appropriate in the circumstances presented. Google further objects to this Request as vague and ambiguous in its use of the phrases “expressly disclose” and “verification pathway.”

Subject to and without waiving its objections, Google admits that the Terms of Service do not state “Google’s automated recovery system may decline to use a configured recovery email address as a verification pathway.” Google states that the operative Google Terms of Service and applicable service-specific terms—including the disclaimer of any guarantee that Google’s services will be available and the limitation of liability—speak for themselves. Google otherwise denies this Request.

REQUEST FOR ADMISSION NO. 24:

Admit that Google’s preservation obligation in this litigation attached no later than the date this lawsuit was served on Google LLC.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Google objects to this Request as calling for a legal conclusion and as seeking information not relevant to any party's claim or defense.

Subject to and without waiving its objections, the existence and timing of any preservation obligation are legal conclusions that Google is not required to admit or deny. To the extent a factual response is required, Google directs Plaintiff to its Response to Order to Show Cause re Preliminary Injunction, filed May 28, 2026.

REQUEST FOR ADMISSION NO. 25:

Admit that Google has records reflecting the billing name and billing address associated with purchases, subscriptions, or recurring charges tied to haterfactory2@gmail.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 25:

Google objects to this Request as seeking information neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving its objections, Google admits that it has billing records associated with haterfactory2@gmail.com.

REQUEST FOR ADMISSION NO. 26:

Admit that Google has records reflecting the billing name and billing address associated with purchases, subscriptions, or recurring charges tied to haterfactory@gmail.com.

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Google objects to this Request as seeking information neither relevant to any claim or defense nor proportional to the needs of the case, in that Plaintiff asserts no claim regarding billing on haterfactory@gmail.com. Google further objects to this Request to the extent Plaintiff's claims regarding that account are barred by the applicable statute of limitations and by the doctrine of laches.

Subject to and without waiving its objections, Google admits that it has billing records associated with haterfactory@gmail.com.

Dated: July 14, 2026

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: */s/ Matthew R. Reed*

Attorneys for Defendant Google LLC

VERIFICATION

I, Tal Almogy, declare:

I serve as Senior Product Support Manager at Google LLC. I am authorized to make this verification on its behalf. I have read the foregoing DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSION, SET ONE, and know its contents.

The responses were prepared with the assistance of counsel and are based on information and documents assembled by Google's employees and counsel. Not all of the matters stated in the responses are within my personal knowledge; the responses also contain matters of interpretation, legal conclusions, and contentions. I am informed and believe, and on that basis certify, that the matters stated in the responses are true and correct based on information reasonably available to Google following a reasonable investigation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 14, 2026, at Mountain View, California.

Signed by:
Tal Almogy
B6E6DA453E0842F...
Tal Almogy

Exhibit 9

Legal Meet and Confer / Deficiency Letter: Plaintiff's Discovery Requests, Set One – Ryan v. Google LLC (Case No. 26CV488743)

NFT Demon <jeremy@nftdemon.com> Tue, Jul 14, 2026 5:16 PM

To: "Reed, Matthew" <mreed@wsgr.com>, "Stokes, Jenna" <jenna.stokes@wsgr.com>

Bcc: <halimahprado@googlemail.com>, <hdelaine@gmail.com>, <hdelaine@google.com>, <hdelaine@googlemail.com>, <kwalker@google.com>, <cwheaton@googlemail.com>, <courtneywheaton@googlemail.com>, <courtney.wheaton@googlemail.com>, <dazooza@gmail.com>, <sean.dsouza@googlemail.com>, <daniel.williams@googlemail.com>, <danielwilliams@googlemail.com>, <dbw@google.com>, <ellenbogen@google.com>, <ellenboges@gmail.com>, <mellenbogen@googlemail.com>

Dear Mr. Reed,

I am writing in receipt of Defendant Google LLC’s Objections and Responses to Plaintiff’s Special Interrogatories, Requests for Production, and Requests for Admission (Set One), served on July 14, 2026. Please treat this communication as a formal effort to meet and confer in a good-faith attempt to resolve significant deficiencies in Google's responses pursuant to California Code of Civil Procedure §§ 2030.300, 2031.310, and 2033.290.

Google’s uniform deployment of boilerplate objections and categorical refusals to answer straightforward inquiries has severely disrupted the discovery process. Specifically, Google’s responses contain severe logical and factual contradictions that must be cured to avoid motion practice.

1. The Financial Mitigation and "Ownership" Paradox

Google has objected to virtually every substantive request for account records, billing data, and communication logs on the grounds that I have "not established" ownership or authorization over the accounts, claiming third-party privacy concerns shield this data. This position is legally unsupportable and contradicted by Google's own verified responses:

The Mitigation Contradiction: In Response to Special Interrogatory No. 11, Google explicitly asserts under penalty of perjury that I failed to mitigate my damages by, among other things, "cancelling subscriptions through available means". Google cannot logically contend that I am responsible for mitigating charges on these subscriptions while simultaneously refusing to produce the billing records of those exact charges under a blanket "privacy" objection.

Admitted Possession: In Responses to Requests for Admission Nos. 25 and 26, Google explicitly admitted that it possesses the specific billing records, names, and addresses tied to haterfactory2@gmail.com and haterfactory@gmail.com.

Google cannot weaponize the core dispute of this lawsuit—the lockout and authentication status—to withhold the very records required to prove or disprove the claims and affirmative defenses at issue. Google must supplement its responses to Special Interrogatories Nos. 8, 13, and 16, and Requests for Production Nos. 1, 2, 12, 23, and 26, by producing the requested baseline log and billing data.

2. Evasive Platform Systems and Technical Objections vs. RFA Admissions

Google heavily objects to Special Interrogatories Nos. 3, 4, and 5, and associated RFPs, claiming that technical system design and recovery pathway mechanics are irrelevant, proportional burdens, or trade secrets. Yet, Google's verified admissions show otherwise:

Google has admitted in Requests for Admission Nos. 3 and 4 that its system transmitted a formal alert to jeremy@segwayjeremy.com explicitly verifying that it "is the recovery email for this account".

Google further admitted in Request for Admission No. 20 that its account recovery systems possess the exact technical capability to route verification codes to a configured recovery email.

Because Google has formally admitted these technical capabilities exist but failed to utilize them to restore access, the internal protocols governing why the automated system bypassed or failed this pathway are entirely relevant to the core breach of contract and statutory claims. Google must withdraw its objections and provide substantive answers to Special Interrogatories Nos. 3, 4, and 5, and produce the related guidelines sought in Requests for Production Nos. 16 and 17.

3. Factual Insufficiency of Affirmative Defenses

In Response to Special Interrogatory No. 10, which demanded the complete factual basis for Google's "unclean hands" defense, Google pointed exclusively to an out-of-state federal criminal docket (United States v. Ryan, M.D. Fla.) and subsequent pre-trial release conditions.

Under California law, the defense of unclean hands requires a direct nexus to the specific consumer transaction being litigated. Google's response fails to establish any transactional relationship between unrelated out-of-state federal restrictions and Google's explicit billing and platform obligations under California law (including AB 2863). Google must supplement this response to provide a legally sufficient, locally relevant factual basis, or withdraw the defense.

4. Unassailable, Public Proof of Account and Domain Ownership

Google's persistent refusal to recognize my identity is further rendered completely frivolous by public, verifiable internet registry records:

Verifiable WHOIS Records: The domain segwayjeremy.com was registered in 2023. The public WHOIS registry record for this domain has permanently and continuously listed my legal name alongside the exact Google Voice number (608-630-4975) currently at issue in this litigation.

Direct DNS Control & Workspace Migration: I maintain active, absolute DNS control over segwayjeremy.com. I have recently transitioned the recovery address, jeremy@segwayjeremy.com, to an active, secure Google Workspace email platform and served formal notice of this transition to both Google LLC and its counsel.

There is no legitimate "authentication" or "third-party privacy" concern remaining. I have established complete, verified control over the domain, the recovery email, and the registration record tying my legal name to the Google Voice asset. Google's continued refusal to process my verification on these facts constitutes active, bad-faith stonewalling.

Next Steps and Timeline

Given that Google has admitted it possesses the relevant billing records and has already formally verified parts of the core correspondence, the preparation of supplemental responses should require minimal platform execution time.

Please let me know by 5:00 PM on Friday, July 18, 2026, whether Google will voluntarily withdraw its standard objections and provide comprehensive, non-evasive supplemental responses and document productions on these items. If Google stands firmly by these boilerplate responses, I will proceed with a Motion to Compel Further Responses accordingly.

Thank you for your attention to this matter.

Sincerely,

Jeremy Ryan/NFT Demon
Founder and CEO
NFT Demon Holdings LLC
858-327-1144
linktr.ee/nftdemon

Exhibit 10

BBB Core Team
Google, LLC
1600 Amphitheatre Pkwy
Mountain View CA 94043

Dear BBB Core Team:

Better Business Bureau (BBB) received a complaint about your business. BBB understands that there are two sides to every dispute, and we have not pre-judged the validity of this claim. This is your opportunity to address the concerns of your consumer and to rebuild the trust that first brought you together. BBB seeks to help businesses resolve their disputes, whether or not they are accredited with BBB. The complaint was submitted on **3/2/2026** and was assigned an ID of **24589850**.

How do I take care of this?
Your BBB is requesting a written response to this complaint within the next **20 calendar days**. Your prompt and professional response greatly enhances the chance for a successful resolution and will further your reputation as a BBB Accredited Business. If you received this complaint via email, the fastest and easiest way to view and respond is to the simply click on the **"Respond to this Complaint"**, link located on the left. All responses will be copied to the complainant.

If you received this complaint via Postal Mail, you may respond online using the link below or respond by mail using the address above.
To access/respond to this complaint online:
Go to: https://respond.bbb.org/letter/
Enter the following code: 24589850-983AA

What should I include in my response?
Please provide an explanation of the events from your perspective and/or a concrete plan for how to work toward a resolution. Remember that the more factual information we have about the case, the easier it is for all parties to develop a full understanding of the situation.

Please understand that the complaint content and your response may be publicly posted on the BBB web site (BBB reserves the right to not post in accordance with BBB policy). Please do not include any information that personally identifies your customer. By submitting your response, you are representing that it is a truthful account of your experience with this consumer. BBB may edit the complaint or your response to protect privacy rights and to remove inappropriate language.

What will happen if I do not submit a response and what can I expect to happen next?
If you do not respond promptly to this complaint, it may be closed as Unanswered. This may result in a substantially lower rating with BBB, which could adversely influence potential customers. Once we receive your response, we will forward it to your customer and ask them to tell us in writing whether your response resolves their concerns. If they continue to express dissatisfaction, the case will be reviewed by BBB staff to determine if the remaining concerns warrant an additional response. The overall standard applied in the review process is: *Did the company act in good faith, and do everything that could be reasonably expected, or is responsible for, to resolve the issue?*

We look forward to helping you and your customer work toward an amicable resolution.

Sincerely,

Raquel N
Complaints Specialist

CUSTOMER EXPERIENCE INFORMATION

Customer Information:
Jeremy Ryan
4075 Park Blvd 102-165
San Diego, CA 92103
Daytime Phone: (858) 327-1144
E-mail: jeremy@nftdemon.com

The details of this matter are as follows:

Complaint Involves:
Advertising Issues

Customer's Statement of the Problem:

My devices were seized by the FBI but I keep getting billed for the AI ultra plan. The backup number when I try to log in is my Google voice number. It doesn't offer a code to backup email and again the FBI has all of my devices. I need to cancel billing or get into my account. I have the card, PayPal account it's billed off of, ID, and even access to the backup email but that is not enough.

Complaint Background:
Order Number: haterfactory2@gmail.com

Desired Settlement:
Other (requires explanation)
Ideally a way into the account otherwise stop billing and refund last 2 months

Jeremy Ryan
4075 Park Blvd 102-165
San Diego,CA 92103

Dear Jeremy Ryan:

This message is in regard to your complaint submitted on 3/2/2026 against Google, LLC. Your complaint was assigned ID 24589850.

BBB has received a formal response from Google, LLC. We ask that you review the response and understand that BBB is here to assist both parties in reaching a fair and reasonable resolution.

Please review their response to your complaint and advise us of your position in the matter **within 10 calendar days**. If we do not hear back from you, BBB will assume you are satisfied and will close your complaint as answered.

Please be sure to indicate whether the business' response is satisfactory or not and how you would like to proceed in this matter.

If you received this complaint via Postal Mail, you may respond online using the link below or respond by mail using the address above.
To access/respond to this complaint online:
Go to:
Enter the following code: 24589850-3644D

Sincerely,

Raquel N
Complaints Specialist

MESSAGE FROM BUSINESS:

Hi,

We apologize for any frustration the customer may be experiencing as a result of Google products or support. For the best and fastest support for their issue, we encourage the customer to contact us directly using the specified links below. For additional products and information, please contact us at https://support.google.com/

If the customer has already reached out through Google Support channels, we ask that they please share their existing Case ID, so we can further investigate. Thank you.

For refund requests please contact us here: https://support.google.com/googleplay/answer/2479637?hl=en
Or for information on reporting Gift Card Scams or other abuse, please visit this page:
https://support.google.com/googleplay/gethelp

Thanks,
BBB Core Team

Jeremy Ryan
4075 Park Blvd 102-165
San Diego, CA, 92103

Dear Jeremy Ryan:

Thank you for contacting the Better Business Bureau. This message is in regard to your complaint submitted on 3/2/2026 against Google, LLC. Your complaint was assigned ID 24589850.

Now that I have filed, what is the next step?
We have forwarded your complaint to the business for their response. We have asked the business to reply promptly, but some disputes may take longer than others to conclude. Please be patient as we work to ensure that your concerns are addressed.

What if I do not agree with the response from the business?
It is important for both parties to maintain realistic expectations and respond in a professional, fair and courteous manner. Our goal is for you and the business to be able to work towards an amicable solution. Should this prove difficult, we may offer you and the business the opportunity to participate in binding arbitration. More information about these options can be found at www.bbb.org

What happens if a business does not respond?

BBB will make every effort to obtain a response from the business, but some businesses simply do not ever contact us. BBB is not an enforcement agency. We cannot force a business to respond. However, failure to do so may result in a negative impact on their BBB rating, which may drive away future customers. BBB can also refer you to other agencies that may be able to assist you, depending on the specific nature of your complaint.

Feedback from consumers is vital to BBB. We appreciate your willingness to report this information to us. We look forward to helping you and the business work toward a resolution. Please do not hesitate to contact us with any additional questions or concerns.

Sincerely,

Raquel N
Complaints Specialist

Complaint: 24589850

I am rejecting this response because: after spending 14 hours on the aforementioned support site I could not find a single helpful article nor a single way to reach a person. The closest I got was asking the community and 7 days later have 0 responses. Therefore support is non existent via that channel.

Sincerely,

Jeremy Ryan
BBB Core Team
Google, LLC
1600 Amphitheatre Pkwy
Mountain View CA 94043

Dear BBB Core Team:

This message is in regard to a complaint submitted to the BBB about your business on 3/2/2026 by Jeremy Ryan. This complaint was assigned ID 24589850.

Why am I receiving another letter regarding this complaint?
We recently received additional correspondence from the consumer in the above-referenced case. The information has been reviewed by your consultant and we believe this information warrants some additional remarks from your company.

How do I see the new information?
If received via email the fastest and easiest way to view and respond to the complaint is to use the link on the left.

If you received this complaint via Postal Mail, you may respond online using the link below or respond by mail using the address above.
To access/respond to this complaint online:
Go to: https://respond.bbb.org/letter/
Enter the following code: 24589850-983AA

What should I include in my response to the consumers rebuttal?
Please respond to the additional information that has been provided by the consumer. If you have not already

done so, please submit copies of supporting documents to your BBB using the contact information at the bottom of this correspondence. **Please understand that the complaint content and your response will be publicly posted on the BBB web site (BBB reserves the right to not post in accordance with BBB policy). Please do not include any information that personally identifies your customer. By submitting your response, you are representing that it is a truthful account of your experience with this consumer. BBB may edit the complaint or your response to protect privacy rights and to remove inappropriate language.**

In the interest of time and good customer relations, please respond within **10 calendar days.**

How many more times will I have to respond to this complaint?
We appreciate the response you have already provided and our goal is to minimize back-and-forth communication. The new information provided by the consumer may have brought up new concerns that your BBB consultant felt needed some clarification. By providing this information, you are allowing BBB to develop a more complete picture of the situation and how to move forward.

Generally, resolving a complaint requires both parties to move from their current position to a middle ground. In your response, please state your position and if possible indicate what steps can be taken by both parties to resolve this matter. If necessary, the BBB will offer its mediation and/or arbitration services to bring a close to this matter.

We look forward to your prompt attention to this matter.

Sincerely,

Raquel N
Complaints Specialist

MESSAGE FROM CONSUMER:

Complaint: 24589850

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Sincerely,

Jeremy Ryan

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If the customer has already reached out through Google Support channels, we ask that they please share their existing Case ID, so we can further investigate. Thank you.

For refund requests please contact us here: https://support.google.com/googleplay/answer/2479637?hl=en
Or for information on reporting Gift Card Scams or other abuse, please visit this page:
https://support.google.com/googleplay/gethelp

Thanks,
BBB Core Team

Hi Team,

Thanks for bringing this to our attention.

We will thoroughly review the case and get back to you with an update.

Thanks!
Jyoti
Google one Tier 3

Jeremy Ryan
4075 Park Blvd 102-165
San Diego,CA 92103

Dear Jeremy Ryan:

This message is in regard to your complaint submitted on 3/2/2026 against Google, LLC. Your complaint was assigned ID 24589850.

BBB has received a formal response from Google, LLC. We ask that you review the response and understand that BBB is here to assist both parties in reaching a fair and reasonable resolution.

Please review their response to your complaint and advise us of your position in the matter **within 10 calendar days**. If we do not hear back from you, BBB will assume you are satisfied and will close your complaint as answered.

Please be sure to indicate whether the business' response is satisfactory or not and how you would like to proceed in this matter.

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Sincerely,

Raquel N
Complaints Specialist

MESSAGE FROM BUSINESS:

Hi Team,

Thanks for bringing this to our attention.

We will thoroughly review the case and get back to you with an update.

Thanks!
Jyoti
Google one Tier 3

Complaint: 24589850

I am rejecting this response because: its been 7 days and still no resolution. I have since filed case# 26CV488743 in Santa Clara County Court which will be served to Google shortly over this (just need the clerk to approve the summons but it is public record its been filed). You cannot simultaneously ask people to put the keys to just about every platform in their life on your platform and then lock them out and deny reasonable verification of who they are. Things they could allow (even multiple) could include:

- ID (since they have my card on file which they are fighting charge backs for the charges I cannot cancel)

- A picture of the card itself being charged.

- Official documents from well before the lockout showing that Google Voice number is mine (plenty of court filings use it).

- A call or text to the phone number that all calls currently route to when not picked up as I have access to that phone.

- A code sent to the backup email on file. I get the security alerts I'm trying to log in but cannot get a code?

Instead they offer none of this and no ability to manually review in such a way as that but continue to charge my card and fight chargebacks. This is beyond unacceptable.

Sincerely,

Jeremy Ryan

BBB Core Team
Google, LLC
1600 Amphitheatre Pkwy
Mountain View CA 94043

Dear BBB Core Team:

This message is in regard to a complaint submitted to the BBB about your business on 3/2/2026 by Jeremy Ryan. This complaint was assigned ID 24589850.

Why am I receiving another letter regarding this complaint?

We recently received additional correspondence from the consumer in the above-referenced case. The information has been reviewed by your consultant and we believe this information warrants some additional remarks from your company.

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Go to: https://respond.bbb.org/letter/
Enter the following code: 24589850-983AA

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Please respond to the additional information that has been provided by the consumer. If you have not already done so, please submit copies of supporting documents to your BBB using the contact information at the bottom of this correspondence. **Please understand that the complaint content and your response will be publicly posted on the BBB web site (BBB reserves the right to not post in accordance with BBB policy). Please do not include any information that personally identifies your customer. By submitting your response, you are representing that it is a truthful account of your experience with this consumer. BBB may edit the complaint or your response to protect privacy rights and to remove inappropriate language.**

In the interest of time and good customer relations, please respond within **10 calendar days.**

How many more times will I have to respond to this complaint?
We appreciate the response you have already provided and our goal is to minimize back-and-forth communication. The new information provided by the consumer may have brought up new concerns that your BBB consultant felt needed some clarification. By providing this information, you are allowing BBB to develop a more complete picture of the situation and how to move forward.

Generally, resolving a complaint requires both parties to move from their current position to a middle ground. In your response, please state your position and if possible indicate what steps can be taken by both parties to resolve this matter. If necessary, the BBB will offer its mediation and/or arbitration services to bring a close to this matter.

We look forward to your prompt attention to this matter.

Sincerely,

Raquel N
Complaints Specialist

MESSAGE FROM CONSUMER:

Complaint: 24589850

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- A code sent to the backup email on file. I get the security alerts I'm trying to log in but cannot get a code?

Instead they offer none of this and no ability to manually review in such a way as that but continue to charge my card and fight chargebacks. This is beyond unacceptable.

Sincerely,

Jeremy Ryan

Hi Team,

We reached out to the user via the case ID : 5-0866000040996 on Mar 11, 2026 and suggested the account recovery steps because the user was unable to access the account that had the subscription (as per the user's statement).

To assist the user with the account-related issue or to check the account details, it is necessary to authenticate the account. The user said that they had tried all the steps however they were unable to recover the account.

We reached out and explained to the user that we're unable to take any further action in this because we're unable to authenticate their account.

Thanks,
Google One Tier 3
Sonu Sharma

Jeremy Ryan
4075 Park Blvd 102-165
San Diego,CA 92103

Dear Jeremy Ryan:

This message is in regard to your complaint submitted on 3/2/2026 against Google, LLC. Your complaint was assigned ID 24589850.

BBB has received a formal response from Google, LLC. We ask that you review the response and understand that BBB is here to assist both parties in reaching a fair and reasonable resolution.

Please review their response to your complaint and advise us of your position in the matter **within 10 calendar days**. If we do not hear back from you, BBB will assume you are satisfied and will close your complaint as answered.

Please be sure to indicate whether the business' response is satisfactory or not and how you would like to proceed in this matter.

If you received this complaint via Postal Mail, you may respond online using the link below or respond by mail using the address above.
To access/respond to this complaint online:
Go to: https://respond.bbb.org/letter/
Enter the following code: 24589850-3644D

Sincerely,

Raquel N
Complaints Specialist

MESSAGE FROM BUSINESS:

Hi Team,

We reached out to the user via the case ID : 5-0866000040996 on Mar 11, 2026 and suggested the account recovery steps because the user was unable to access the account that had the subscription (as per the user's statement).

To assist the user with the account-related issue or to check the account details, it is necessary to authenticate the account. The user said that they had tried all the steps however they were unable to recover the account.

We reached out and explained to the user that we're unable to take any further action in this because we're unable to authenticate their account.

Thanks,
Google One Tier 3
Sonu Sharma

Complaint: 24589850

I am rejecting this response because: they clearly ignored my previous response because I provided numerous ways to authenticate the account. To charge someone and keep charging them because your only means of authentication is illogical is not only illegal but unacceptable.

Sincerely,

Jeremy Ryan
Jeremy Ryan
4075 Park Blvd 102-165
San Diego CA 92103

Dear Jeremy Ryan,

This message is regarding Complaint ID # 24589850- Google, LLC

Your complaint is closed for one of the following reasons:

We understand you are NOT satisfied with the business's response, and have noted your dissatisfaction in our files. While we were unable to reach your desired resolution, the business has provided your Better Business Bureau (BBB) with its position. This matter is now closed in BBB files, and will appear in the company's BBB Business Profile as: "Answered - the business addressed the issues within the complaint, but the consumer remains dissatisfied."

OR

We have not received your response to confirm this complaint has been resolved. Therefore, this complaint has been closed and will appear in the company's BBB Business Profile as: “Answered- BBB has not heard back from the consumer as to their satisfaction with the business's response.”

If this is the case, please reply to this email and for the complaint to be reopened so you can submit a response to the business. After your request is processed, you will receive an email asking for your response with a link to the complaint.

Please note, the text of your response may be publicly posted on BBB's website. BBB reserves the right to not post in accordance with BBB policy, and we may edit your response to protect privacy rights and to remove inappropriate language.

We appreciate the opportunity to be of service, and sincerely hope you will contact us for future pre-purchase information.

Sincerely,

Raquel N
Complaints Specialist

MESSAGE FROM BUSINESS:

Hi Team,

We reached out to the user via the case ID : 5-0866000040996 on Mar 11, 2026 and suggested the account recovery steps because the user was unable to access the account that had the subscription (as per the user's statement).

To assist the user with the account-related issue or to check the account details, it is necessary to authenticate the account. The user said that they had tried all the steps however they were unable to recover the account.

We reached out and explained to the user that we're unable to take any further action in this because we're unable to authenticate their account.

Thanks,
Google One Tier 3
Sonu Sharma

BBB Core Team
Google, LLC
1600 Amphitheatre Pkwy
Mountain View CA 94043

Re: ID # 24589850 - Jeremy Ryan

Dear BBB Core Team:

Thank you for your cooperation in responding to the above consumer's complaint.

We forwarded your response to Jeremy Ryan. The consumer notified our office that they are not satisfied. BBB has determined your company has addressed the issues within the complaint; therefore we have closed this case in our files. This matter will appear in your BBB Business Profile as: “Answered - The Business addressed the issues within the complaint, but the consumer did not accept the response, OR BBB has not heard back from the consumer as to their satisfaction.”

The text of your response may be publicly posted on BBB’s website. BBB reserves the right to not post in accordance with BBB policy, and we may edit your response to protect privacy rights and to remove inappropriate language. In the event the consumer contacts BBB again regarding this issue, we may reach out to you to review any new or additional information we've received from the consumer.

We appreciate your cooperation in addressing this matter and hope we can be of service to you in the future.

Sincerely,

Raquel N
Complaints Specialist

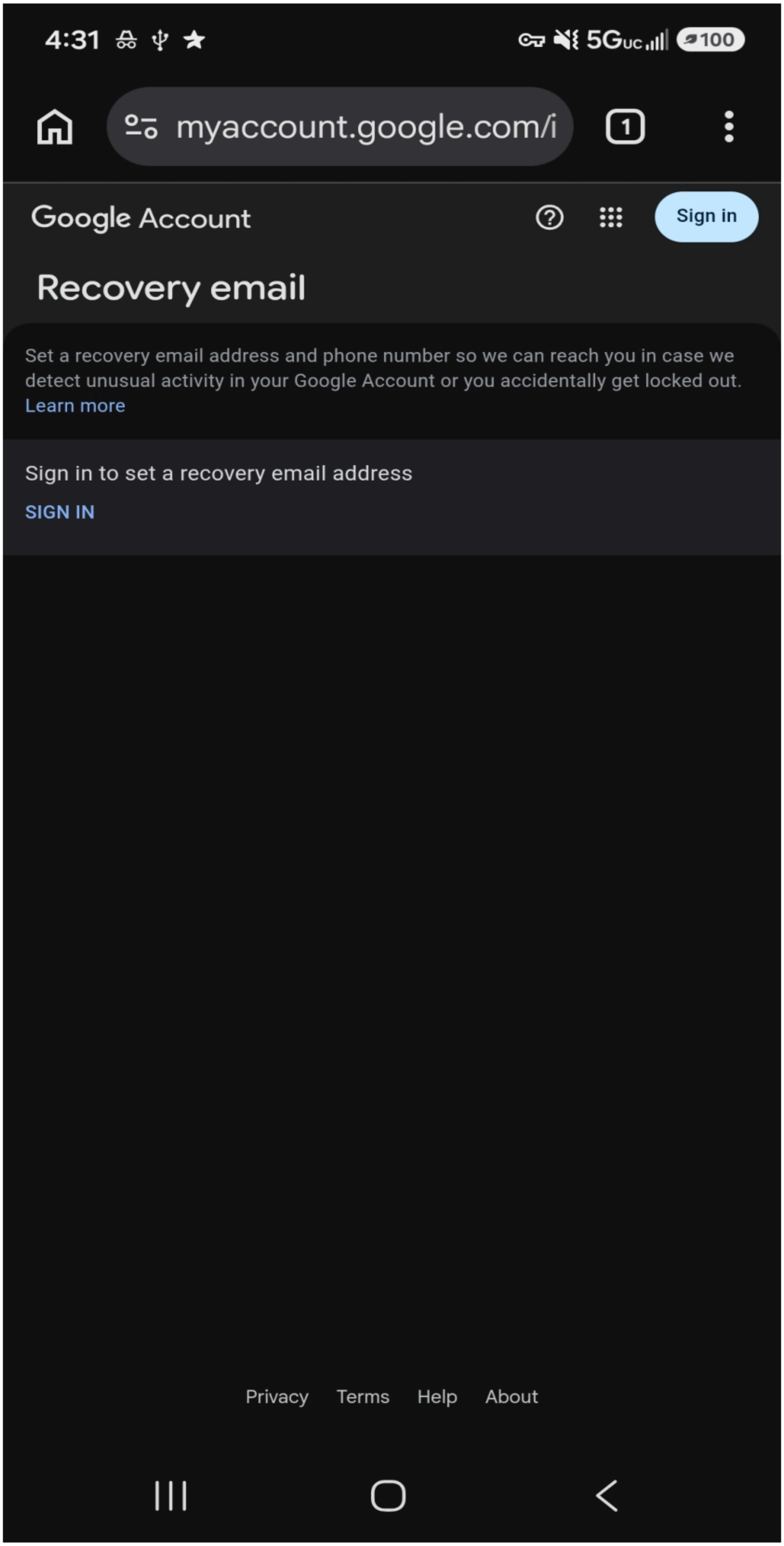
Exhibit 11

Recovery email

Set a recovery email address and phone number so we can reach you in case we detect unusual activity in your Google Account or you accidentally get locked out. Learn more

Sign in to set a recovery email address

SIGN IN


4:31
5GUC
100
myaccount.google.com/i
1

Google Account

Sign in

Recovery email

Set a recovery email address and phone number so we can reach you in case we detect unusual activity in your Google Account or you accidentally get locked out. Learn more

Sign in to set a recovery email address

SIGN IN

Privacy
Terms
Help
About